

**CEQA FINDINGS OF FACT
AND STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES COUNTY GENERAL PLAN UPDATE EIR**

STATE CLEARINGHOUSE NO. 2011081042

I. BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA and the specific reasons for considering the project acceptable even though the project has significant impacts that are infeasible to mitigate.

The lead agency is responsible for the adequacy and objectivity of the EIR. The County of Los Angeles (County), as lead agency, has subjected the Draft EIR (DEIR) and Final EIR (FEIR) to the agency's own review and analysis. The Board of Supervisors certifies that the DEIR, FEIR, and Findings of Fact reflect the independent judgment of the County.

A. PROJECT SUMMARY

The proposed project includes the following components:

- Comprehensive General Plan Update for the unincorporated areas of Los Angeles County.
- Amendment to Title 22 of the County Code to adopt a Significant Ecological Areas (SEA) Ordinance.
- Amendment to Title 22 of the County Code to adopt a Hillside Management Area (HMA) Ordinance.
- Zone changes for consistency with the General Plan Update.
- Amendments to Title 22 of the County Code related to the industrial zones.
- Amendments to Title 22 of the County Code related to the MXD zone (including rescinding the Transit Oriented Districts Ordinance)
- Amendments to Title 22 of the County Code to add the R-5, C-MJ, and ()-IP zones.
- Zone nomenclature modification of Zone R-3, R-4 and, C-3.
- Adoption of a Community Climate Action Plan (CCAP).

Each of these components is discussed below.

Proposed General Plan

The Proposed Project is a comprehensive update to the Existing General Plan. The Proposed General Plan Update is intended to guide growth and development within the unincorporated areas.

The Proposed Project includes revisions to elements that are required by the State of California and to optional elements. The Project includes the reorganization of the existing General Plan. Table 1-1, *Comparison between Proposed General Plan Update and Existing General Plan*, lists the nine proposed elements that will replace the adopted elements. The update to the Housing Element, which is a component of the General Plan, was adopted by the Board of Supervisors on February 4, 2014, for the 2014–2021 planning period. The Housing Element is incorporated by reference, but is not analyzed in this DEIR.

Table 1-1 Comparison between Proposed General Plan Update and Existing General Plan

Proposed Elements	Existing Elements
Land Use	Land Use
Mobility	Transportation
Air Quality	Conservation and Open Space
Conservation and Natural Resources	Conservation and Open Space
	Scenic Highway
Park and Recreation	Regional Recreation Areas Plan
Noise	Noise
Safety	Safety
Public Services and Facilities	Water and Waste Management
Economic Development	Economic Development

Policy Highlights of the Proposed General Plan

The following describe the major land use policies in the Proposed General Plan, which are supported by goals, policies, programs, and strategic changes to the land use policy maps:

Transit Oriented Districts (TODs)

TODs are areas within a half-mile radius from a major transit station, where the General Plan Update encourages safe and active transportation, infill development, high-density mixed use development along commercial corridors, and pedestrian-friendly and community-serving uses. The goal of the TODs is to encourage walking, bicycling, and transit use. TODs are located along the Metro Gold Line, Gold Line Extension, Blue Line, Green Line, and near the Silver Line. The General Plan Update will expand the existing TODs from approximately a quarter-mile radius to a half-mile radius from the transit stations. All TODs are envisioned in the future to have a TOD specific plan with standards, regulations, and capital improvement plans that are tailored to the unique characteristics and needs of each community.

Special Management Areas

Los Angeles County's Special Management Areas require additional development regulations that are necessary to prevent the loss of life and property, and to protect the natural environment and important resources. Special Management Areas include but are not limited to Agricultural Resource Areas, Airport Influence Areas, Seismic Hazard Zones, Flood Hazard Zones, Significant Ecological Areas, Hillside Management Areas, and Very High Fire Hazard Severity Zones. The Proposed Project minimizes risks to hazards and limits development in Special Management Areas through

goals, policies, and programs. The Proposed Project also includes the Hazard, Environmental, and Resource Constraints Model, which is a visual representation of the Special Management Areas and serves 1) as a tool to inform land use policies for future community-based planning initiatives; 2) to inform applicants and planners of potential site constraints and regulations; and 3) to direct land use policies and the development of planning regulations and procedures to address hazard, environmental, and resource constraints.

Agricultural Resource Areas (ARAs) are areas where the Proposed Project promotes the preservation of agricultural land. These areas are protected by policies to prevent the conversion of farmland to incompatible uses.

Significant Ecological Areas (SEAs) include undisturbed or lightly disturbed habitat supporting valuable and threatened species, linkages and corridors to promote species movement, and are sized to support sustainable populations of its component species. The objective of the SEA Program is to preserve the genetic and physical diversity of the County by designing biological resource areas capable of sustaining themselves into the future. However SEAs are not wilderness preserves. Much of the land in SEAs is privately held, used for public recreation or abuts developed areas. Thus the SEA Program is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and development projects that are incompatible with the long term survival of the SEAs.

Hillside Management Areas (HMAs) are areas with a natural slope gradient of 25 percent or steeper. The HMA Ordinance ensures that development preserves the physical integrity and scenic value of HMAs, provides open space, and enhances community character by avoiding development in HMAs to the extent feasible; locating development in the portions of HMAs with the fewest constraints; and using sensitive design techniques.

Employment Protections Districts

The Proposed General Plan Update identifies Employment Protection Districts (EPDs), which are economically viable industrial land and employment-rich land, with policies to prevent the conversion of industrial land to nonindustrial uses.

Zoning Consistency

In order to maintain consistency between the updated General Plan Land Use Policy Map and the Zoning Map, rezoning is necessary where the proposed land use designation would no longer be consistent with zoning. In addition, the zoning consistency program also includes amendments to the Zoning Code. The General Plan Land Use Policy Map establishes the long-range vision for general intended uses. Title 22 (Planning and Zoning) of the Los Angeles County Code (Zoning Code herein) and Zoning Map implement that vision by providing details on specific allowable uses.

Proposed Zoning Map Amendments

Approximately 3,500 parcels are proposed to be rezoned. For the General Plan Update, the staff used two approaches to rezoning: 1) implementation of major policies in the Plan, and 2) “clean-up” of the Zoning Map. The Master Parcel List and map are provided in Appendix D. The Proposed Zoning Maps are provided as Appendix C3, *Proposed Zoning Maps*.

Rezoning to Implement Major Policies

The first approach to rezoning involves changes that need to be made on the Zoning Map to implement some of the major policies in the Plan. One major policy is to encourage high density housing and commercial-residential mixed uses along major commercial corridors within the

proposed Transit Oriented Districts (TODs). The Mixed Use (MXD) zone is proposed to be mapped onto parcels along some of these major corridors that are designated Mixed Use (MU) on the Land Use Policy Map.

Also, to implement the industrial preservation policy in the Plan, the new Industrial Preservation (I)-IP combining zone is proposed to be added onto economically viable and employment-rich industrial lands within the proposed EPDs.

Rezoning for “Cleanup” Purposes

The second approach to rezoning, which represents a majority of the proposed zone changes, is Zoning Map “clean-up.” Parcels rezoned for “clean-up” are those where the general intended uses identified on the Land Use Policy Map are inconsistent with most uses allowed by zoning. In addition, the Zoning Map “clean-up” process eliminates spot zoning, reduces conflicts between adjacent uses, reflects land use trends, and eliminates unnecessary split-zoning.

Proposed Amendments to the Zoning Code

As discussed above, the Proposed General Plan Update introduces major new goals and policies that aim to:

- Encourage mixed use opportunities, and infill and transit-oriented development,
- Preserve employment-rich land; and
- Preserve rural character by limiting incompatible commercial activities in rural communities

To implement these goals and policies, and to align Title 22 to be consistent with the Plan, new residential, commercial and industrial zones and revisions to the existing mixed-use and industrial zones are proposed. Furthermore, an industrial zone, an existing rural mixed use zone and the TOD Ordinance are proposed for elimination.

The following summary describes the purpose of each amendment:

R-5 High Density Residence Zone: Zone R-5 provides detailed uses, development standards and procedures for high-density residential development. Housing types allowed in the zone include multifamily developments at densities that are permitted under General Plan Land Use Categories H100 and H150, which respectively allow up to 100 and 150 units per net acre. There are limited exceptions for the allowance of single-family and two-family residences in this zone. This zone includes language to refer certain projects to the Department of Public Works for initial application review to ensure that utility infrastructure, circulation and sightline controls are sufficiently addressed.

MXD Mixed Use Zone: Zone MXD is an existing Special Purpose zone in Title 22 that was significantly revamped. This zone will provide greater flexibility in permitting limited commercial and residential uses by-right to encourage mixed use projects. Zone MXD provides detailed uses, development standards, and procedures for mixed-use developments with residential and commercial uses, within multi-use buildings or single-purpose buildings containing a different use. This zone includes language to refer certain projects to the Department of Public Works for initial application review to ensure that utility infrastructure, circulation and sightline controls are sufficiently addressed.

C-MJ Major Commercial Zone: Zone C-MJ provides detailed uses, development standards, and procedures that accommodate regional-scale commercial and recreation uses, hotels, and high-density, multi-family residential and residential-commercial mixed uses. This zone also includes

language to refer certain projects to the Department of Public Works for initial application review to ensure that utility infrastructure, circulation and sightline controls are sufficiently addressed.

(Q)-IP Industrial Combining Zone: Zone ()-IP provides a list of non-industrial uses that are not permitted on industrially zoned properties within EPDs, which will preserve and promote current and future industrial uses, labor-intensive activities, wholesale sales of goods manufactured on-site, major centers of employment, and limited employee-serving commercial uses.

Modifications to the Industrial Zones

- Addition of new purpose statements for Zones M-1, M-1.5, M-2 and M-2.5 and the recoding of abbreviations for Zones M-1½ and M-2½ to M-1.5 and M-2.5, respectively.
- Reformatting of permitted use language in Zones M-1.5 and M-2 into use lists.
- Consolidation of uses related to the manufacturing of specific products into categories of product types.
- Addition or modification of uses to be consistent across all Industrial Zones. For example, airports are currently not listed in Zone M-1.5. Since it is a Conditional Use Permit (CUP) use in Zones M-1 and M-2, it could otherwise mistakenly be interpreted to mean that it is a use prohibited in Zone M-1.5.
- Clarification of certain uses across all Industrial Zones. For example, clarification is made to specify the types of schools permitted or prohibited in the Industrial Zones.
- Establishment of a maximum FAR for each of the Industrial Zones (except MPD, B-1 and B-2) within the development standards sections.
- The relocation of the list of all prohibited uses for each Industrial Zone into a standalone section in Part 1 of Chapter 22.32, so that only one prohibited use list governs all Industrial Zones.

Elimination of Zones and Districts

- Elimination of Zone M-4, as the zone is no longer mapped.
- Elimination of Zone A-C (Arts and Crafts). This zone is not mapped and has not been for the past three decades. The main issue with this zone is that it requires a CUP for all artisan occupations within residences in certain areas. Other Title 22 regulations provide more flexibility in governing the use of a limited range of commercial or artisan activities within or close to residences.
- Elimination of the Blue Line and Green Line Transit Oriented District Ordinance. Zone MXD will be mapped in place on certain parcels around a few TODs, and all other zones within all TODs covered by that ordinance will revert back to the general development standards of the base zones. As a replacement, future tools, such as TOD Specific Plans, will be developed for each TOD.

Modification to Residential and Commercial Zones

- Zone nomenclature modification of Zone R-3, R-4 and, C-3.

Proposed Ordinances

The proposed amendments to the Zoning Code include updating the following ordinances, which are provided in Appendix E.

Hillside Management Area (HMA) Ordinance Update: The purpose of this ordinance is to ensure that development preserves the physical integrity and scenic value of HMAs, provides open space, and enhances community character by avoiding development in HMAs to the extent feasible; locating development in the portions of HMAs with the fewest constraints; and using sensitive design techniques.

Significant Ecological Areas Ordinance Update: The purpose of the SEA ordinance is to provide a process that allows balanced development within the SEAs and reconciles potential conflicts between conservation and development within the SEAs. This process would ensure that environmentally sensitive development standards and designs are applied to proposed developments within the SEAs and that the biological resources within development sites, as well as potential impacts to such resources from proposed developments, are assessed and disclosed. In addition, the purpose of the ordinance is to ensure that development conserves the county's biological diversity, as well as the habitat quality and the connectivity of the SEA to be developed, so that the species populations and habitats can be sustained into the future.

Community Climate Action Plan

Climate action plans include an inventory of greenhouse gas (GHG) emissions and measures for reducing future emissions to achieve a specific reduction target. The County has prepared a Community Climate Action Plan (CCAP) to mitigate and avoid GHG emissions associated with community activities in the unincorporated areas. The CCAP address emissions from building energy, land use and transportation, water consumption, and waste generation. The measures and actions outlined in the CCAP tie together the County's existing climate change initiatives and provide a blueprint for a more sustainable future. The CCAP is a sub-element of the Air Quality Element.

The CCAP identifies emissions related to community activities and established GHG reduction target consistent with AB 32 and provides a roadmap for successfully implementing GHG reduction measures selected by the County. Importantly, the CCAP recognize the County's leadership and role in contributing to statewide GHG emissions reductions. Actions undertaken as part of the CCAP would result in important community co-benefits, including improved air quality, energy savings, and increased mobility, as well as enhance the resiliency of the community in the face of changing climatic conditions.

The CCAP is composed of state and local actions to reduce GHG emissions within the unincorporated areas. The state actions considered in the CCAP include: the Renewable Portfolio Standard, Title 24 Standards for Commercial and Residential Buildings (Energy Efficiency and CALGreen), Pavley/Advanced Clean Cars (Vehicle Efficiency), and the Low Carbon Fuel Standard. These state actions generally do not require action from the County, but will result in local GHG reductions in the unincorporated areas.

There are 26 local actions included in the CCAP. The local actions are grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. Many of the local actions are cost effective, particularly in the green building and energy strategy area, with several

energy efficiency investments that can recoup initial costs in one to five years. In addition to reducing GHG emissions, all local actions have many co-benefits, such as improved public health.

Physical Development under the Proposed General Plan Update

Pursuant to CEQA Guidelines Section 15064(d), this DEIR determines whether there are direct physical changes and reasonably foreseeable indirect physical changes in the environment that would be caused by the Proposed Project. Specifically, this DEIR focuses on impacts from changes to land use associated with buildout of the proposed land use maps (Appendix C1) and impacts from the resultant population and employment growth in the unincorporated areas. The ultimate development of unincorporated areas is not tied to a specific timeline.

The Proposed Project is consistent with the land uses and development intensities already allowed in the Existing General Plan for adopted Community Based Plans. There are limited changes in land use and development intensity for unincorporated urban islands outside of community-based plans.

Buildout projections for the Proposed Project, broken down by Planning Area, are shown in Table 1-2, *Proposed General Plan Buildout Projections*. The Proposed Project's buildout would allow for up to: 659,409 residential dwelling units; 92 million square feet (2,129 acres) of commercial use; 102 million square feet (5,210 acres) of industrial use; 503 million square feet (80,896 acres) of public/semi-public; and 714,704 acres of public/open space. These buildout projections are used throughout this DEIR to estimate the magnitude of development that would likely occur within each Planning Area upon buildout of the Proposed Project. The total acreage for each land use designation is used to estimate the number of dwelling units, residents, square feet of nonresidential uses, and employees that would be generated by proposed land uses. These projections are used extensively in the analysis of potential project impacts such as increases in noise or air quality.

It is impossible to perfectly predict the exact development that would occur under the Proposed Project, but a comparison of population, household, and employment projections between the existing land uses and the proposed land uses allowed by the Proposed General Plan allows for an analysis of the relative impacts.

Buildout projections for each Planning Area are shown in Table 1-2. As shown, buildout of the Proposed Project would result in 358,930 additional residential dwelling units compared to existing land uses. Buildout of the Proposed Project would result in an 86 percent increase in commercial uses and a 40 percent increase in industrial uses. The majority of new development is expected to occur in the Antelope Valley Planning Area, which will accommodate about 70.6 percent of new residential units and 76 percent of the population growth. Many of the remaining Planning Areas—such as East San Gabriel Valley, Santa Monica Mountains, South Bay, San Fernando Valley, and Gateway Planning Areas—are already built out, so significant growth is not expected.

Table 1-2 Proposed Project Buildout Projections (by Planning Area)

Land Use Designation	Acres ³	Units	Population ⁵	Bldg. Sq. Footage (in thousands)	Jobs ⁵
Antelope Valley Planning Area ²	1,132,744	278,158	1,070,571	46,870	51,219
Antelope Valley Area Plan^{7,8}	1,132,744	278,158	1,070,571	46,870	51,219
Commercial	902	0	0	19,652	38,329
Industrial	579	0	0	12,606	9,652
Infrastructure	2,649	0	0	0	100
Open Space	583,967	0	0	0	524
Public/Semi-Public	17,029	0	0	14,613	767

Table 1-2 Proposed Project Buildout Projections (by Planning Area)

Land Use Designation	Acres ³	Units	Population ⁵	Bldg. Sq. Footage (in thousands)	Jobs ⁵
Residential	5,541	16,385	62,746	0	485
Rural	522,077	261,773	1,007,826	0	1,361
Coastal Islands Planning Area ²	82,752	21	0	0	570
Santa Catalina Island Local Coastal Land Use Plan	46,137	21	0	0	570
Commercial	26	0	0	0	7
Industrial	690	0	0	0	6
Other	87	0	0	0	0
Public & Open Space	45,197	0	0	0	557
Residential	136	21	0	0	0
Outside Community-Based Plan	36,615	0	0	0	0
East San Gabriel Valley Planning Area ²	28,777	70,097	255,952	150,558	53,231
Hacienda Heights Community Plan	6,360	17,433	65,833	9,864	13,310
Commercial	131	0	0	5,708	11,194
Industrial	28	0	0	609	466
Residential	3,641	17,288	65,274	0	1,315
Rural	862	145	559	0	35
Outside Community-Based Plan	14,996	38,550	139,220	128,560	19,261
Commercial	134	0	0	2,929	5,897
Industrial	378	0	0	8,241	6,310
Open Space	4,984	0	0	0	646
Public/Semi-Public	1,785	0	0	117,391	5,708
Residential	6,265	38,263	138,118	0	600
Rural	1,450	286	1,102	0	100
Rowland Heights Community Plan⁸	7,422	14,115	50,900	12,134	20,661
Commercial	192	0	0	8,378	15,764
Industrial	144	0	0	3,756	3,027
Other	793	723	2,783	0	0
Public & Open Space	1,566	0	0	0	194
Residential	4,727	13,392	48,117	0	1,676
Gateway Planning Area²	9,581	34,446	120,358	202,768	36,820
Outside Community-Based Plan	9,581	34,446	120,358	202,768	36,820
Commercial	142	0	0	3,100	6,067
Industrial	1,481	0	0	32,251	24,694
Open Space	1,411	0	0	0	225
Public/Semi-Public	2,562	0	0	167,417	4,584
Residential	3,985	34,446	120,358	0	1,250
Metro Planning Area²	10,160	92,158	301,073	118,711	100,906
East Los Angeles Community Plan	3,381	41,608	128,487	44,199	42,459
Commercial	338	0	0	21,255	26,156
Industrial	158	0	0	6,873	5,234
Mixed Use & Specific Plan	65	1,563	4,361	3,404	6,848

Table 1-2 Proposed Project Buildout Projections (by Planning Area)

Land Use Designation	Acres ³	Units	Population ⁵	Bldg. Sq. Footage (in thousands)	Jobs ⁵
Other	21	0	0	0	0
Public & Open Space	582	0	0	12,667	2,753
Residential	2,218	40,045	124,127	0	1,469
Outside Community-Based Plan	4,921	35,028	118,329	61,135	42,509
Commercial	318	0	0	6,919	13,884
Industrial	1,186	0	0	25,832	19,779
Mixed Use & Specific Plan	45	2,695	7,521	1,468	2,873
Open Space	251	0	0	0	374
Public/Semi-Public	412	0	0	26,917	4,602
Residential	2,710	32,332	110,808	0	997
Walnut Park Neighborhood Plan	369	4,338	13,717	2,558	5,044
Commercial	41	0	0	2,135	4,358
Industrial	8	0	0	180	112
Other	4	26	100	0	0
Residential	305	4,312	13,617	0	100
West Athens – Westmont Community Plan	1,489	11,185	40,539	10,820	10,894
Commercial	155	0	0	6,047	8,456
Public & Open Space	278	0	0	4,773	1,813
Residential	1,057	11,185	40,539	0	625
San Fernando Valley Planning Area^{2,4}	27,230	13,464	47,060	55,514	24,741
Outside Community-Based Plan	27,184	13,419	46,886	55,514	24,741
Commercial	57	0	0	1,246	2,522
Industrial	148	0	0	3,225	2,469
Mixed Use & Specific Plan	301	0	0	0	18,700
Open Space	9,759	0	0	0	82
Public/Semi-Public	781	0	0	51,043	749
Residential	1,334	11,630	39,996	0	218
Rural	14,805	1,790	6,890	0	1
Twin Lakes Community Plan	45	45	174	0	0
Rural	45	45	174	0	0
Santa Clarita Valley Planning Area²	270,889	77,155	237,638	0	105,881
Santa Clarita Valley Area Plan⁶	270,889	77,155	237,638	0	105,881
Residential		77,155	237,638		
Non-Residential					81,265-107,123
Santa Monica Mountains Planning Area²	71,303	6,788	26,128	29,667	28,707
Malibu Local Coastal Land Use Plan⁸	51,141	4,347	16,729	15,239	22,138
Commercial	729	0	0	6,352	11,929
Mixed Use & Specific Plan	39	0	0	336	672
Public & Open Space	16,423	0	0	8,551	7,776

Table 1-2 Proposed Project Buildout Projections (by Planning Area)

Land Use Designation	Acres ³	Units	Population ⁵	Bldg. Sq. Footage (in thousands)	Jobs ⁵
Residential	1,005	1,049	4,032	0	0
Rural	32,946	3,298	12,697	0	1,761
Santa Monica Mountains North Area Plan⁸	20,162	2,441	9,399	14,428	6,569
Commercial	166	0	0	3,215	5,959
Infrastructure	0	0	0	0	0
Public & Open Space	6,651	0	0	11,214	73
Residential	425	840	3,235	0	0
Rural	12,920	1,601	6,164	0	537
South Bay Planning Area²	3,304	25,929	86,392	33,945	24,530
Proposed General Plan	3,304	25,929	86,392	33,945	24,530
Commercial	154	0	0	3,362	6,703
Industrial	311	0	0	6,781	5,192
Mixed Use & Specific Plan	72	4,312	12,029	2,347	4,594
Open Space	344	0	0	0	100
Public/Semi-Public	328	0	0	21,455	7,493
Residential	2,095	21,617	74,364	0	447
West San Gabriel Valley Planning Area²	12,237	43,877	156,658	29,641	26,539
Altadena Community Plan⁸	5,604	16,240	61,359	9,996	18,463
Commercial	64	0	0	2,784	9,376
Industrial	38	0	0	1,004	3,075
Infrastructure	815	0	0	0	0
Mixed Use & Specific Plan	255	904	2,800	2,226	4,561
Public & Open Space	915	0	0	3,981	1,066
Residential	3,516	15,335	58,558	0	386
Proposed General Plan	6,633	27,638	95,300	19,645	8,076
Commercial	67	0	0	1,469	2,875
Industrial	55	0	0	1,202	920
Mixed Use & Specific Plan	42	2,495	6,960	1,358	2,658
Open Space	2,675	0	0	0	332
Public/Semi-Public	239	0	0	15,616	430
Residential	3,485	25,138	88,323	0	861
Rural	69	4	17	0	0
Westside Planning Area²	4,079	17,316	55,033	56,661	14,592
Marina del Rey Local Coastal Land Use Plan	694	7,684	21,439	1,861	4,493
Commercial	86	0	0	1,413	4,111
Industrial	5	0	0	112	250
Other	401	0	0	82	82
Public & Open Space	42	0	0	0	0
Residential	159	7,684	21,439	254	50
Proposed General Plan	3,386	9,632	33,594	54,800	10,099
Commercial	89	0	0	1,958	3,924

Table 1-2 Proposed Project Buildout Projections (by Planning Area)

Land Use Designation	Acres ³	Units	Population ⁵	Bldg. Sq. Footage (in thousands)	Jobs ⁵
Open Space	1,336	0	0	0	175
Public/Semi-Public	809	0	0	52,842	5,700
Residential	1,153	9,632	33,594	0	300
GRAND TOTAL	1,653,056	659,409	2,356,864	724,336	467,738

Notes:

- Historically, jurisdiction-wide buildout levels do not achieve the maximum allowable density/intensity on every parcel and are, on average, lower than allowed by the General Plan. Accordingly, the buildout projections in this General Plan do not assume buildout at the maximum density or intensity and instead are adjusted downward to account for variations in buildout intensity.
- The Proposed General Plan has broken the county into 11 Planning Areas. These boundaries will go into effect with the adoption of the General Plan.
- Acres are given as adjusted gross acreages, which do not include the right-of-way for roadways, flood control facilities, or railroads.
- The Twin Lakes Community Plan is included in the San Fernando Valley Planning Area, but it does not include a separate land use legend.
- Projections of population by residential designation are based on a persons-per-household factor that varies by housing type. Additionally, the projections of jobs by designation are based on an employment generation factor that varies by employment category or actual number of jobs. See Appendix D.
- The figures for the unincorporated Santa Clarita Valley reference the figures in the 2010 Environmental Impact Report for the Santa Clarita Valley Area Plan Update (One Valley One Vision). The methodology used to derive the figures for the unincorporated Santa Clarita Valley differs from the methodology used to generate the figures for other unincorporated areas and, therefore, they cannot be broken down by Land Use Category.
- The Antelope Valley Area Plan represents the adopted plan, with the exception of the portion that overlaps with the Proposed General Plan community of 'Kagel/Lopez Canyons. Therefore, the total acreage of the Antelope Valley represented here is less than the actual area of the adopted plan boundary.
- For these communities, an overlay density reduction was done for Hillside Management Areas (HMA). If however, the underlying land use density is lower than this HMA density, then the land use plan density should be applied. The HMA densities are as follows: 25–50% slope (max 1 du/ 2 acres) = 0.5; Greater than 50% slope (max 1 du/20 acres) = 0.05.

Approval of Antelope Valley Area Plan

The above buildout projections identified in Table 1-2 utilized the 1986 Antelope Valley Area Plan land use designations to estimate population, housing, and employment projections for the Antelope Valley Planning Area. On November 12, 2014, after release of the DEIR, the County Board of Supervisors adopted an update to the Antelope Valley Area Plan, which is consistent with the buildout projections identified in the Antelope Valley Reduced Intensity Alternative analyzed in the DEIR. The Proposed Project, as analyzed in the DEIR, assumed 278,158 dwelling units, 1,070,571 population, 51,219 employees, and a jobs/housing ratio of 0.18 for the Antelope Valley Planning Area. With adoption of the Antelope Valley Area Plan Update, anticipated growth in the Antelope Valley has been substantially reduced. The revised numbers are 106,180 dwelling units, 405,410 population, 134,351 employees, and a jobs/housing ratio of 1.3. The County will make the necessary updates to the Proposed Project to be consistent with the recently adopted Antelope Valley Area Plan. As compared to the Proposed Project analyzed in the DEIR, the subsequent reductions in allowable residential development associated with the recently adopted Antelope Valley Area Plan result in reduced impacts to agriculture, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, and water supply and eliminates the previously identified significant impact related population and housing. Since the Proposed Project, as revised, was analyzed in the DEIR as the Antelope Valley Reduced Intensity Alternative, and no new significant impacts are related to the changes, no revisions to the DEIR are necessary.

B. PROJECT OBJECTIVES

- Provide a comprehensive update to the General Plan that establishes the goals and policies to create a built environment that fosters the enjoyment, financial stability, and well-being of the unincorporated areas and Los Angeles County.

- Improve the job-housing balance and fiscal sustainability by planning for a diversified employment base, providing a variety of commercial, industrial, and mixed-use land uses.
- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
- Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change.
- Support a reasonable share of projected regional population growth.
- Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the character and ecological importance of the unincorporated areas.
- Provide policy guidance to protect and conserve natural resources and to improve the quality of air, water, and biological resources.
- Coordinate equitable sharing of public and private costs associated with providing appropriate community services and infrastructure, and in a context-sensitive manner that addresses community character.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
- Recognize community and stakeholder interests while striving for consensus.
- Protect and enhance recreational opportunities and public access to open space and natural resources.

C. ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the County of Los Angeles CEQA Guidelines, the County of Los Angeles conducted an extensive environmental review of the proposed project.

- The County of Los Angeles determined that an EIR analyzing all environmental impacts would be required for the proposed project and issued a Notice of Preparation (NOP) on August 15, 2011. The public review period extended from August 15, 2011, to September 14, 2011.
 - The project description was revised after the August 15, 2011 NOP was released, resulting in changes to the scope of the upcoming EIR from what was originally identified. Thus, the NOP was reissued on June 20, 2013 with a public review period extending from June 28, 2013 to July 29, 2013.

- Based on CEQA Appendix G: Environmental Checklist Form, the County of Los Angeles staff determined that a Draft EIR (DEIR) should be prepared for the proposed project. The scope of the DEIR was determined based on Appendix G of the CEQA Guidelines, comments received in response to the NOP, and comments received at the scoping meeting conducted by the County on July 11, 2013. Section 2.4 of the DEIR describes the issues identified for analysis in the DEIR.
- The County of Los Angeles prepared a DEIR, which was made available for a 45-day public review period beginning June 23, 2014, and ending August 7, 2014.
- The County prepared a Final EIR (FEIR), including the Response to Comments to the DEIR, the Findings of Fact, and the Statement of Overriding Considerations. The FEIR/Response to Comments contains comments on the DEIR, responses to those comments, revisions to the DEIR, and appended documents.
- The County held public hearings on the proposed project, including a Regional Planning Commission hearing on December 10, 2014, and a Board of Supervisors' Hearing on [Date TBD].

D. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the County in conjunction with the proposed project;
- The FEIR for the proposed project;
- The DEIR;
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR;
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR;
- All written and verbal public testimony presented during a noticed public hearing for the proposed project;
- The Mitigation Monitoring and Reporting Program;
- The reports and technical memoranda included or referenced in the Response to Comments;
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR;
- The Resolutions adopted by the County in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto;
- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations;

- Any documents expressly cited in these Findings; and
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

E. CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the County's actions related to the project are at the Los Angeles County Department of Regional Planning, 320 W. Temple Street, Room 1356, Los Angeles, CA 90012. The County Department of Regional Planning is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Department of Regional Planning. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

II. FINDINGS AND FACTS

The County of Los Angeles, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the DEIR and FEIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the FEIR.
 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

III. FINDINGS AND FACTS REGARDING IMPACTS

This section of the document is divided into the following parts:

- Part A, *Impacts Determined to Be Less Than Significant*, presents the impacts of the proposed project that were determined in the EIR to be less than significant without the addition of mitigation measures and presents the rationales for these determinations.
- Part B, *Impacts Mitigated to Less Than Significant*, presents significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the Mitigation Monitoring and Reporting Program, and the rationales for the findings.
- Part C, *Significant Unavoidable Impacts*, presents significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the Mitigation Monitoring and Reporting Program (if available), the findings for significant impacts, and the rationales for the findings.

Because of the environmental analysis of the project; compliance with existing laws, codes, and statutes; and the identification of feasible mitigation measures, some potentially significant impacts have been determined by the County to be reduced to a level of less than significant, and the County

has found—in accordance with CEQA Section 21081(a)(1) and State CEQA Guidelines Section 15091(a) (1)—that “Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. This is referred to herein as “Finding 1.” Where the County has determined—pursuant to CEQA Section 21081(a)(2) and State CEQA Guidelines Section 15091(a)(2)—that “Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency,” the County’s finding is referred to herein as “Finding 2.” Finding 2 is not utilized in this findings document.

Where, as a result of the environmental analysis of the project, the County has determined that either: (1) even with the compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, potentially significant impacts cannot be reduced to a level of less than significant, or (2) no feasible mitigation measures or alternatives are available to mitigate the potentially significant impact, the County has found in accordance with CEQA Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3) that “Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.” This is referred to herein as “Finding 3.”

A. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

The County determined that all environmental topics in the Environmental Checklist (CEQA Guidelines Appendix G) would have the potential to result in significant impacts. Thus, an Initial Study was not prepared. The County determined that an EIR would be required for the Proposed Project and issued a Notice of Preparation (NOP) on August 15, 2011 to the State Clearinghouse, responsible agencies, and interested parties. The 30-day public review period ran from August 15, 2011 through September 14, 2011. A second NOP was issued on June 26, 2013 to July 26, 2013 to advise interested parties and responsible agencies that the project description had been revised to not consider the Antelope Valley Area Plan Update. All environmental topics were therefore determined to require full assessment in the DEIR.

Draft EIR

This section identifies environmental impacts of the proposed project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with Existing Regulations as detailed in Chapter 5 of the DEIR.

1. Aesthetics

Impact 5.1-1: Implementation of the Proposed Project could have a substantial adverse impact on scenic vistas.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-19 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

The Proposed Project includes land use designations, new zones, and new zoning that have the potential to result in new development with greater intensities than previously permitted. This is especially true for areas within Transit Oriented Districts (TODs) where more intense infill is being encouraged to complement planned improvements to Los Angeles County’s transportation system. Buildout of the Proposed General Plan Update is anticipated to increase the number of units in the Project Area by 358,931 and the number of nonresidential square feet by 7.2 million, compared to

existing conditions. With this growth, viewsheds or scenic vistas would have the potential to be interrupted by new buildings and structures, which could detract from the quality of those vistas. Additionally, other new development that would be accommodated by the Proposed General Plan Update, including potential improvements to the transportation system, could have the potential to impact scenic vistas. For these reasons, the Proposed Project would have the potential to impact scenic vistas in Los Angeles County. However, there are a variety of existing and proposed regulatory processes, such as the update to the Hillside Management Area (HMA) Ordinance, which would serve to minimize these potential impacts.

Several sections of the County Code regulate physical development by controlling not only the appearance of new development, but also by controlling the placement of new development with consideration for surrounding uses. Requirements relating to conditional use permits would ensure that development projects that would be accommodated by the Proposed Project would be held to appropriate development standards of the County Code. Regulations outlined in the County Code relating to HMAs would ensure that the physical character and scenic value of areas of the County with a natural slope gradient of steeper than 25 percent are preserved. Since hillsides and ridgelines are some of the primary resources related to scenic vistas in Los Angeles County, the provisions of the County Code would significantly reduce impacts to these areas. Additionally, regulations in the County Code that limit the size of and control the siting of signs, particularly outdoor signs including billboards, would also limit the impact of the Proposed Project on scenic vistas. Compliance with these provisions would be ensured through the County's development review and building permit process.

Another important aspect of the regulatory framework that would lessen potential impacts to scenic vistas is the fact that the Proposed Project is programmatic in nature, which means that subsequent projects accommodated by the Proposed Project—*projects requiring discretionary approval*—would be subject to separate project-level environmental review in accordance with CEQA. The individual project's contribution to the degradation of scenic vistas would be assessed at the time formal development plans/applications are submitted to the County for review and approval.

Further, a number of goals and policies of the Proposed General Plan Update, would also serve to minimize potential impacts by preventing degradation of existing vistas and promoting actions that would make existing scenic vistas more accessible to people. Implementation of Policies C/NR 13.1 through C/NR 13.7, in particular, would ensure that scenic vistas in the Project Area are protected.

Finding:

Upon implementation of regulatory requirements and conditions of approval for any future discretionary projects, this impact would be less than significant.

Impact 5.1-2: Implementation of the Proposed Project would not substantially alter scenic resources within a state or county scenic highway.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-20 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

There are three adopted state scenic highways in Los Angeles County: Angeles Crest Highway (State Route 2), from 2.7 miles north of I-210 to the San Bernardino County line; Mulholland Highway (two sections), from State Route 1 (SR-1) to Kanan Dume Road, and from west of Cornell Road to east of Las Virgenes Road; and Malibu Canyon–Las Virgenes Highway, from SR-1 to Lost Hills

Road. All three highways traverse the Project Area. There are also eight eligible scenic highways in the Project Area.

Under the Proposed Project, no development or changes would occur along or near any of the three adopted state scenic highways. While some development or changes could occur near eligible scenic highways, the development or changes that would occur would be minimal and would only occur near small stretches of the eligible scenic highways. Additionally, future discretionary projects accommodated by the Proposed Project would be subject to a separate project-level environmental review in accordance with CEQA, wherein the individual project's contribution to the degradation of scenic highways would be assessed at the time formal development plans/applications are submitted to the County for review and approval.

A number of goals and policies of the Proposed General Plan Update would also serve to minimize potential impacts to scenic highways by preventing degradation of existing vistas, as well as by promoting actions that would make existing scenic vistas more accessible to individuals. Therefore, no significant impact would result from implementation of the Proposed Project with respect to the substantial alteration of scenic resources within a designated scenic highway.

Finding:

Upon implementation of the policies identified in the General Plan Update as well as regulatory requirements, this impact would be less than significant.

Impact 5.1-3: Implementation of the Proposed Project would substantially alter the existing visual character or quality of portions of the Project Area and its surroundings.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-23 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Growth anticipated during the planning period of the Proposed General Plan Update would have the potential to affect the visual character and quality of the Project Area and its surroundings. Buildout of the Proposed Project is anticipated to increase the number of units in the Project Area from 300,478 to 659,409, an increase of 358,931 units at buildout. Some of the guiding principles of the Proposed Project advocate the use of Smart Growth development strategies—which aim to create compact, walkable, and transit-oriented communities—as well as excellence in environmental resource management. Part of the way that the Proposed Project seeks to adhere to these principles is by creating TODs, including infill development in areas with existing infrastructure and access to transit, rather than continuing historical sprawling land use patterns.

In order to implement the goals and policies contained in the Proposed General Plan Update, the Proposed Project includes amendments to the County's Zoning Ordinance, allowing for increased development potential. All TODs established under the Proposed Project would require the preparation of future specific plans (or similar tools) for each TOD. These specific plans would be required to undergo separate CEQA review, which would require disclosure of potential impacts to the visual character of those individual specific plan areas. Additionally, the development standards and design guidelines established in each specific plan, including shade and shadow standards, would ensure that individual development projects are designed and constructed in a manner that would not be detrimental to the areas surrounding the individual development sites.

In addition, existing regulations, including provisions contained in the County's Zoning Ordinance relating to the regulation of building form, massing, subdivisions, signs, architectural features, CUPs,

design, and oak tree preservation would serve to lessen the impact of the Proposed Project on the visual character of the Project Area. For example, future development that would be accommodated by the Proposed Project would continue to be subject to Part 1 (General Design Requirements) of Chapter 22.52 (General Regulations) of the County's Zoning Ordinance. The continued application of such regulations would serve to reduce potential impacts related to changes to the visual character associated with implementation of the Proposed Project. Compliance with these provisions would be ensured through the County's development review and building permit process.

In addition, a number of goals and policies of the Proposed Project would serve to minimize potential impacts related to the degradation of the existing visual character or quality of the Project Areas affected by the Proposed Project. Implementation of Policies C/NR 13-1 through C/NR 13-6, in particular, would ensure that new developments are designed to be compatible with the local aesthetic environment.

In summary, implementation of the Proposed Project would have the potential to result in substantial changes to the visual character of Los Angeles County, primarily related to the overall magnitude of growth anticipated. The continuation of guidelines and development standards existing in the regulatory framework would serve to lessen the potential impacts of the Proposed Project by providing consistency from past to future development. Additionally, several of the guiding principles, goals, policies, and implementation programs contained in the Proposed Project would serve to lessen or mitigate potential impacts of the Proposed Project by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the Proposed Project.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.1-4: Implementation of the Proposed Project would generate additional sources of light and glare that would adversely affect day and nighttime views in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-29 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Being one of the largest metropolitan areas in the country, Los Angeles County is located in an urbanized context. This means that the existing levels of lighting and light pollution are already relatively high, especially in highly urbanized areas. Some rural and open space areas, including the higher elevations of the Santa Monica Mountains and San Gabriel Mountains, do not have existing high levels of light and light pollution. However, these areas are not planned for growth in the Proposed Project. Implementation of the Proposed Project would allow for additional development throughout the Project Area, which would introduce new or additional sources of light into the Project Area and its surroundings, with the potential to affect day and nighttime views. However, due to the existing high levels of light and glare in the Project Area, and with implementation of aspects of the existing regulatory framework and the Proposed Project goals and policies associated with light and glare, the Proposed Project's impact would not be significant in this respect.

Further, the County's Zoning Ordinance (Title 22 of the County Code) contains provisions intended to limit adverse light and glare impacts. For example, Section 22.52.820 (General Regulations) of Part 10 (Signs) requires that no lighted signs be placed or directed so as to permit illumination to be directed or beamed upon a public street, highway, sidewalk or adjacent premise. Part 9 (Rural

Outdoor Lighting District) of Chapter 22.44 (Supplemental Districts) establishes rural outdoor lighting districts. These districts were established as a supplementary district for the rural areas of the Project Area to promote and maintain dark skies for the health and enjoyment of individuals and wildlife. Implementation of the County's Rural Outdoor Lighting District standards would minimize impacts by requiring outdoor lighting to be scaled appropriately and to be designed in a context-sensitive manner. Compliance with these and other applicable provisions of the County's Zoning Ordinance would be enforced through the County's development review and building permit process.

In addition to applicable provisions of the County Code, CEQA requires that development projects requiring discretionary approval be required to undergo separate project-level environmental review, wherein the individual project's contribution to additional sources of light and glare would be assessed at the time formal development plans/applications are submitted to the County for review and approval. Additionally, the California Building Code contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulation light power and brightness, shielding, and sensor controls. These regulations would serve to mitigate potential impacts of new land uses.

Goals and policies of the Proposed General Plan Update would serve to further minimize potential impacts related to additional sources of light and glare. In particular, implementation of Policy C/NR 13.3 would ensure that light trespass and light pollution is minimized.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

2. Agriculture and Forestry Resources

Impact 5.2-2: The Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-31 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Proposed Zoning Changes

The Proposed Project includes establishment of three new zones. The R-5 High Density Residence Zone, the Mixed Use Zone (MXD), and the Major Commercial Zone (C-MJ), would be designated in intensely urbanized areas; designation of such zones would have no impact on agricultural uses on mapped farmland. The Proposed Project does not add the R-5 zone to the Zoning Map. Therefore, implementation of the Proposed Project would not involve rezoning of farmland and impacts regarding conversion of mapped farmland to non-agricultural uses would be less than significant.

Williamson Act Contracts

The only Williamson Act contracts in effect in Los Angeles County are for land on Santa Catalina Island (CDC 2013). There is no mapped Important Farmland on the Island. The Proposed Project does not propose changes to land use designations or zoning on Santa Catalina Island. No impact to Williamson Act contracts would occur.

Finding:

Implementation of the Proposed Project would not conflict with zoning for agricultural use or conflict with farmlands bearing Williamson Act contracts.

Impact 5.2-3: The Proposed Project would not conflict with zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

Support for this environmental impact conclusion is fully discussed starting on page 5.2-31 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California Public Resources Code Section 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (California Public Resources Code Section 4526). The Los Angeles County Zoning Code does not contain zones specifically for forest use or production of forest resources. Additionally, forest use is not specified as a permitted use in any of the three agricultural zones. As the County has no existing zoning specifically designating forest use, implementation of the Proposed Project would not conflict with existing zoning for forest land or timberland. No impact would occur.

Finding:

The County does not have any existing zoning for forest use; thus, the Proposed Project would have no impact on forest land.

Impact 5.2-4: The Proposed Project will not result in the loss of forest land or conversion of forest land to nonforest use.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-32 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Forests in Los Angeles County are largely limited to mountain ranges in three of the eleven Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Small areas of forest are also found at the northern edge of the East San Gabriel Valley and West San Gabriel Valley Planning Areas. The largest concentration of forest is in the Angeles National Forest, which covers 25 percent of the land area of Los Angeles County. However, very little of its area contains forests or woodlands as defined by the California Public Resources Code. Most of the land area in the Angeles National Forest is chaparral or similar scrub communities. Forests in Los Angeles County are limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. These natural communities would be protected by existing regulations, including Sections 1600 et seq. of the California Fish and Game Code.¹ Mitigation measures set forth in Section 5.4 of

¹ California Department of Fish and Wildlife (CDFW) jurisdiction over riparian habitat extends to the edge of riparian habitat extending outward from a stream, pursuant to California Fish and Game Code Sections 1600 et seq.

the DEIR would reduce impacts to these natural communities from projects approved under the Proposed Project.

Forest land within Los Angeles County is also protected through the County's Significant Ecological Area (SEA) Ordinance. As part of the Proposed Project, the County is in the process of updating the SEA designations and policies, including changes to the policies, boundaries and technical descriptions of the County's SEAs. The Proposed Project identifies 21 SEAs and 9 Coastal Resource Areas (CRAs)^{2,3} that represent the wide-ranging biodiversity of Los Angeles County and contain its most important biological resources. The 21 SEAs and 9 CRAs are recommended to replace the 61 SEAs as designated in the Existing General Plan. Only those areas designated as SEA would be subject to the SEA program, while the CRAs would fall under the regulation of the California Coastal Act. Compliance with the SEA Ordinance will reduce potential impacts to forest land to a less than significant level.

Finding:

Compliance with existing regulations would ensure the Proposed Project would not adversely affect forest land.

3. Biological Resources

Impact 5.4-5: The Proposed Project would require compliance with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state policies or ordinances protecting biological resources.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-117 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

The County's Oak Tree Ordinance regulates oak trees of 25 inches or more in circumference (8 inches in diameter), or in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 38 inches (12 inches in diameter) diameter at breast height (DBH). An oak tree permit must be obtained to cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any regulated oak tree. Additionally, the County adopted the Oak Woodlands Conservation Management Plan (OWCMP) in 2012, which develops a consistent policy for the management of oak woodlands. The OWCMP extends CEQA consideration of impacts to oak woodlands comprised of oaks 5 inches or larger in DBH.

The OWCMP is intended to encourage the preservation of oak woodlands through Los Angeles County. It is the intent of the County to maintain and expand the oak woodland habitat by requiring development designs to avoid impacts to oak woodlands and require appropriate compensatory mitigation where oak woodland impacts disturb or remove such habitat.

In addition, the County has recently finished an Oak Woodlands Conversation Management Plan Guide, which details the process by which the County will determine the extent of oak woodland habitat, the requirement for the preparation of an oak woodland report, an analysis of impacts to the

² It should be noted that because portions of the Santa Monica Mountains SEA and the Palos Verdes Peninsula and Coastline SEA are within the California Coastal Zone, these portions of the SEAs are proposed as Coastal Resource Areas (CRAs). The Draft SEA Ordinance will not apply to CRAs. Although CRAs have equivalent ecological significance to SEAs, the CRAs are within the California Coastal Zone, and the SEA Ordinance is superseded by the California Coastal Act. Both Santa Catalina Island and the Coastal Zone of the Santa Monica Mountains have individual California Coastal Commission Local Coastal Programs which regulate development within them.

³ Santa Catalina Island is designated as a CRA only and is not considered a SEA.

extant oak woodland and the need for mitigation for impacts to the oak woodland habitat. This discretionary review by the County will be in compliance with CEQA.

The Proposed Project will incorporate the proposed SEAs, which are designed to identify the County's most sensitive biological resources, including oak trees and oak woodlands. Additionally, the Conservation and Natural Resources Element of the Proposed General Plan Update outlines the policies for the protection of biological resources.

The County Oak Tree Ordinance and OWCMP are applied on a project-specific level and consistency with these plans will be determined on a project-by-project basis. The policies of the Proposed Project support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree Ordinance or OWCMP.

As detailed in the Conservation and Natural Resources Element of the Proposed General Plan Update, Los Angeles County's coastal zone contains valuable biological resources, including San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands and the Santa Monica Mountains. The study and management of these resource areas is more rigorous than other areas in Los Angeles County, and any land disturbance is regulated through coastal land use plans and local coastal programs (LCPs), in compliance with the California Coastal Act. Biological resource management and regulation within these areas are implemented through the Marina del Rey LCP, Santa Catalina Island LCP, the Malibu Local Coastal Land Use Plan, and the Santa Monica Mountains LCP. Island resources, such as SEAs, are identified in the LCP and are subject to restrictive development regulations. Any changes to the SEA boundaries or associated regulations require an amendment to the LCP and certification by the California Coastal Commission. Finally, resources within San Clemente Island and the Ballona Wetlands are managed by the U.S. Navy and California Department of Parks and Recreation, respectively. The policies of the Proposed General Plan Update do not conflict with these goals and policies of these plans and LCPs.

The County Hillside Management Area (HMA) Ordinance applies to all unincorporated areas that contain Hillside Management Areas, which includes terrain with a natural slope of 25 percent or greater. The buildout of the Proposed Project will impact hillsides; however, the HMA Ordinance is applied on a project-specific level and consistency with these plans will be determined on a project-by-project basis.

Finding:

The Proposed Project would be required to comply with existing ordinances, conservation management plans, and local coastal plans and would not conflict with existing plans protecting biological resources.

4. Cultural Resources

Impact 5.5-3: Grading activities pursuant to buildout of the Proposed Project could potentially disturb human remains.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-21 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

There are thousands of archaeological sites within Los Angeles County, and human habitation in Los Angeles County is known to date to at least approximately 7,000 years B.C. Therefore, human remains could be buried in soils. Excavation during construction activities by projects consistent with

the Proposed Project has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of Los Angeles County. Human burials have specific provisions for treatment in Section 5097 of the California Public Resources Code, which authorizes the Native American Heritage Commission to resolve any disputes related to the disposition of Native American burials. Public Resources Code Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, compliance with these regulations would ensure impacts to human burial grounds remain less than significant.

Finding:

Development in accordance with the Proposed Project would be required to comply with existing regulations; thus, impacts would be less than significant.

5. Geology and Soils

Impact 5.6-1: Project Area residents, occupants, or structures could potentially be exposed to seismic-related hazards.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-18 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Rupture of a Known Earthquake Fault

Several areas of the Project Area are within designated Alquist-Priolo Zones. Project implementation would result in the construction of new buildings, many of which are expected to be residential in nature. The siting of such buildings would have to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, the purpose of which is to prevent the construction of residential buildings on top of the traces of active faults. Adherence to this law, and the associated setbacks from active fault traces, would help reduce the hazards associated with earthquake fault rupture to a less than significant level.

Strong Seismic Ground Shaking

Strong ground shaking is very likely to occur in Los Angeles County during the useful lives of structures that would be developed or redeveloped pursuant to the Proposed Project. The Project Area, and Los Angeles County in general, contain more than two dozen active earthquake faults. Of the active faults, the southern section of the San Andreas Fault is estimated to be capable of generating the largest earthquake, potentially in excess of M_w 7.1.

Strong seismic shaking is a risk throughout Southern California; thus, the Project Area is not at greater risk of seismic activity or impacts than other areas. Additionally, the State regulates development through a variety of tools that reduce hazards from earthquakes and other geologic

hazards. The California Building Code contains building design and construction requirements that are intended to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards.

The County building regulations are included in the County Code, Title 26, Chapters 2 through 35, and Appendices C, I, and J, where the County has adopted the most recent version of the California Building Code (CBC) by reference. Future development projects pursuant to the Proposed Project would be required to adhere to the provisions of the CBC, which are imposed on project developments by the County during the building plan check and development review process. Each future development would be preceded by a detailed, site-specific geotechnical investigation. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce the hazards associated with strong seismic ground shaking to a less than significant level.

Liquefaction

Based on assessments of anticipated intensity and duration of seismic shaking; the origin, texture, and composition of shallow sediments, and the presence of shallow groundwater, several parts of the Project Area have been mapped by the State as areas prone to seismically induced liquefaction. However, future development pursuant to the Proposed Project would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Geotechnical investigations for future development projects considered for approval by the County pursuant to the Proposed Project would be required to evaluate the potential for liquefaction and other seismic ground failure such as lateral spreading, under the respective project sites. Geotechnical investigation reports would provide recommendations for grading and for foundation design to reduce hazards to people and structures arising from liquefaction and other seismic-related ground failure. Future development projects pursuant to the Proposed Project would be required to adhere to existing building and grading codes, and construction-related grading requires the preparation and submittal of site-specific grading plans and geotechnical reports that must be reviewed and approved by the County beforehand.

Seismically Induced Landslides

The propensity for earthquake-induced landslides is greatest in hilly areas, with steep slopes and bedrock or soils that are prone to mass movement. Very few areas of the Project Area have been mapped by the State as zones of seismically induced landslide hazards under the Seismic Hazard Zonation Program. Nevertheless, the existing County's building plan check and development review process provides meaningful safeguards against exposure to such hazards.

In addition, several policies included in the Conservation and Natural Resources and Safety Elements of the Proposed Project have been developed to address potential seismic-related hazards such as ground shaking, liquefaction, and seismically induced landslides.

Compliance with existing state and county regulations, as well as goals and policies included as part of the Proposed Project would ensure that the impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level.

Finding:

Compliance with existing regulations would reduce impacts from seismic-related hazards to less than significant.

Impact 5.6-2: Project implementation would result in substantial soil erosion, the loss of topsoil, or development atop unstable geologic units or soils, or expansive soils.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-20 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Erosion

Project buildout would involve construction-related ground disturbance in various parts of Los Angeles County, particularly in the Antelope Valley Planning Area, which is expected to accommodate approximately 69 percent of new residential units. During future development, soil would be graded and excavated, exposed, moved, and stockpiled. Construction and site grading of future development projects pursuant to the Proposed Project could cause substantial soil erosion without effective soil-erosion measures.

Policies concerning development in Hillside Management Areas (HMAs) provide protection against substantial soil erosion, particularly in areas dominated by steep slopes. In particular, the Draft HMA Ordinance, which amends Title 22, Planning and Zoning, of the Los Angeles County Code, encourages development in HMAs on less steep slopes, and incorporates sensitive hillside design through design measures such as site planning, grading and facilities, and road circulation design through a CUP prior to development in most HMAs. The existing HMA Ordinance contains separate definitions for urban and non-urban (rural) HMAs. The proposed update to the Ordinance defines HMAs as any portion of a lot or parcel containing a terrain with a natural slope gradient of 25% or steeper. For the purposes of determining whether a CUP is required, isolated HMAs under a certain size are exempt. The Draft Ordinance also contains definitions for additional terms, including: constraints, development, Hillside Design Guidelines, Improved Open Space, Natural Open Space, Rural Land Use Designation, and Sensitive Design Techniques.

Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County's building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Under the state-administered NPDES, the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) would be required as well as deployment of approved erosion control best management practices (BMPs). Construction projects on sites one acre or larger are required to prepare and implement a SWPPP. The SWPPP is required to obtain coverage under the Statewide General Construction Activity permit issued by the State Water Resources Control Board. The SWPPP would specify BMPs that would be used during the construction phase of each affected project to minimize water pollution, including pollution with sediment.

In addition to the requirement to prepare a SWPPP, grading during development is subject to erosion control measures in the County's Building Code, specifically Title 26, Appendix J. This code includes restrictions and practices that must be followed by developers in Los Angeles County. The faces of cut-and-fill slopes and development sites shall be prepared and maintained to control against erosion. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. Consequently, impacts would be less than significant.

Unstable Geologic Units or Soils and Expansive Soils

In most areas of the County, unstable geologic units or soils, or expansive soils are not of concern. Nevertheless, areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the Proposed Project could expose structures or persons to potentially significant hazards due to unstable geologic units or soils.

Individual development projects would be required to adhere to existing building and grading codes related to soil preparation/conditioning to minimize hazards from unstable and expansive soils. Grading and soil compaction also requires the preparation of site-specific grading plans, soils and geology reports to address liquefaction, subsidence, and other potential geologic or soil stability issues. Such plans and reports must be tendered to the County for review and approval before the Proposed Project can commence. Submittal of these technical plans and studies would ensure that hazards arising from unstable and expansive soils would be minimized to the extent practicable.

In addition, policies included in the Conservation and Natural Resources and Safety Elements of the Proposed Project have been developed to address these potential hazards. Compliance with existing state and county regulations, as well as the goals and policies included as part of the Proposed Project, would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. Consequently, the overall, associated impacts would be less than significant.

Finding:

Development in accordance with the Proposed Project would be required to adhere to federal regulations (NPDES permits), County codes, and goals and policies under the General Plan Update. Impacts would be less than significant.

Impact 5.6-3: Soil conditions would adequately support proposed septic tanks.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-22 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Most new development that is anticipated in the Project Area would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer systems, where the wastes would be conveyed by pipes to plants for treatment. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) would be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the Proposed Project at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Impacts would be less than significant.

Finding:

Septic tank uses are required to comply with County codes and obtain approval from the Department of Public Health; thus, impacts would be less than significant.

6. Hazards and Hazardous Materials

Impact 5.8.1: Buildout in accordance with the Proposed Project would involve the transport, use, and/or disposal of hazardous materials.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-16 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would result in land uses in the Project Area that typically involve the use, storage, disposal and transportation of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. Many products containing hazardous chemicals are also used and stored in homes routinely. Varying quantities of hazardous materials are manufactured, used, or stored at facilities in the Project Area, from manufacturing facilities to local dry cleaning establishments or gardening supply stores.

Additionally, the transportation of hazardous materials/waste may increase as a direct result of increased hazardous materials/waste usage within Los Angeles County. There are 18 hazardous waste facilities that service the Project Area, and hazardous materials/waste sources are located in all of the Planning Areas. The transportation of hazardous materials/waste occurs mostly along major roadways in Los Angeles County. Therefore, it is likely that the transportation of hazardous materials/waste would cross through or pass by all land use types in Los Angeles County, including residential and other sensitive land uses.

Numerous federal, state and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Regulations that would be required of those transporting, using or disposing of hazardous materials include the Resource Conservation and Recovery Act (RCRA), which provides the ‘cradle to grave’ regulation of hazardous wastes; Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; the International Fire Code (IFC), which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; California Code of Regulations (CCR) Title 27, which regulates the treatment, storage and disposal of solid wastes; and the County Consolidated Fire Code, which regulates hazardous materials and hazardous substance releases. For development within the State of California, Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520.

LACoFD is the Certified Unified Program Agency (CUPA) for the County, and is responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, LACoFD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk-management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on development sites. The plan also contains an emergency-response plan, which describes the procedures for mitigating a hazardous release, procedures, and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the Hazardous Materials Division, the Office of Emergency Services, and other emergency-response personnel, such as the local Fire Agency having jurisdiction.

Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the LACoFD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Implementation of the Proposed Project would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses, as designated under the Proposed Project, would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials would be less than significant.

Finding:

Compliance with existing federal, state, and local regulations regarding the use, transport, and/or disposal of hazardous materials would ensure impacts from the Proposed Project remain less than significant.

Impact 5.8-2: Some areas within the Project Area are included on a list of hazardous materials sites.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-17 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Numerous sites within the Project Area are listed on hazardous materials databases compiled pursuant to Government Code Section 65962.5. Some of the sites are listed as closed, indicating that they have been investigated and/or remediated to the satisfaction of the lead responsible agency (i.e., Regional Water Quality Control Board, Department of Toxic Substances Control, Alameda County Department of Environmental Health, Alameda County Water District) based on land use at the time of closure. The Proposed Project would facilitate new development, including residential, mix-use, commercial, parks, and recreational open spaces, within Los Angeles County. Some of the new development could occur on properties that are likely contaminated. Construction of new buildings during site grading and excavation operation, and demolition of existing structures could potentially result in the release hazardous building materials (e.g., asbestos, lead paint, etc.) into the environment.

Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. These include, but are not limited to, the following: 1) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which regulates closed and abandoned hazardous waste sites; 2) preliminary remediation goals (PRGs), which establishes tools for evaluating and cleaning up contaminated sites; 3) Cortese List, which provides information about the location of hazardous materials release sites; and 4) California Human Health Screening Levels(CHHSLs), which evaluates sites with potential human health concerns.

In addition, the Proposed Project includes several policies within the Land Use Element that would reduce the potential for the public and the environment to be exposed to hazardous materials from existing site contamination. Compliance with applicable existing regulations and processes would ensure that the Proposed Project would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites. Therefore, the

Proposed Project would have a less than significant impact associated with existing hazardous materials sites.

Finding:

Development in accordance with the Proposed Project would be required to comply with federal and state regulations (e.g., CERCLA, PRGs, Cortese List, CHHSLs, etc.); thus, it would not adversely affect existing hazardous materials sites.

Impact 5.8-3: Some areas within the Project Area are located in the vicinity of an airport or within the jurisdiction of an Airport Land Use Plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-18 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

There are 15 public use airports within the boundaries of the Airport Land Use Commission's (ALUC) jurisdiction, which is coterminous with Los Angeles County. Of these, only two airports in Los Angeles County are located within the Project Area: Aqua Dulce Airport in Santa Clarita Valley and Catalina Airport. Los Angeles International Airport, Palmdale Regional Airport, and the William J. Fox Airfield in Lancaster also have airport influence areas that include portions of the Project Area. Additionally, there are 11 private-use airstrips, one private-use seaplane base, and 138 heliports registered with the Federal Aviation Administration in Los Angeles County.

The County's Airport Land Use Compatibility Plan (ALUCP) provides guidance related to the placement of land uses near the aforementioned airports. These recommendations are based on a variety of factors, including those related to noise, safety, and aircraft movement. In addition to the identification of land use compatibility issues, the ALUCP identifies notification disclosure areas around each airport. These ALUCPs are largely based on requirements provided by the California Airport Land Use Planning Handbook, which was developed using Federal Aviation Administration (FAA) regulations that establish compatible land use and density criteria from recorded crash patterns. However, each ALUCP is unique to the airport it serves.

Implementation of the Proposed Project may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. In addition, the County requires that development projects near public airports comply with any applicable ALUCP. Therefore, potential impacts associated with public airports, private airstrips, and heliports are less than significant.

Finding:

All development within the vicinity of public airports is required to comply with any applicable ALUCP, thereby reducing impacts of the Proposed Project to less than significant levels.

Impact 5.8-4: The Proposed Project could affect the implementation of an emergency response or evacuation plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-19 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Continued growth and development associated with implementation of the Proposed Project has the potential to strain the emergency response and recovery capabilities of federal, state, and local governments. Coordination among various County departments is necessary to ensure adequate emergency response.

The Office of Emergency Management is responsible for organizing and directing the preparedness efforts of the Emergency Management Organization of Los Angeles County. The emergency response plan for the Project Area is the Operational Area Emergency Response Plan (OAERP), which strengthens short and long-term emergency response and recovery capability, and identifies emergency procedures and emergency management routes in Los Angeles County.

LACoFD provides fire, safety, and emergency medical services to the Project Area. LACoFD operates multiple divisions including Air and Wildland, Fire Prevention, and Forestry. The Los Angeles County Sheriff's Department (LASD) is the largest sheriff's department in the country. In addition to specialized services, the LASD is divided into 10 divisions, including the Office of Homeland Security, which focuses on potential threats related to local homeland security issues, such as terrorism or bioterrorism. The LASD provides law enforcement services to more than one million people living within 90 unincorporated communities, as well as to more than four million residents living within 40 contract cities.

Continued growth and development in Los Angeles County will significantly affect the LACoFD and LASD operations. Coordination among various County departments is necessary to ensure adequate emergency response. Collaboration can also ensure that development occurs at a rate that keeps pace with service needs. In addition, several proposed policies of the Safety Element of the Proposed Project have been developed to address this potential hazard.

Compliance with applicable regulations and implementation of the Proposed Project goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.

Finding:

Implementation of the Proposed Project would be required to adhere to applicable regulations and policies of the Proposed General Plan Update, and impacts would be less than significant.

Impact 5.8-5: Portions of the Project Area are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-21 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Los Angeles County faces major wildland fire threats due to its hilly terrain, dry weather conditions, and the nature of its plant coverage. The at-risk areas are designated as Fire Hazard Severity Zones (FHSZs) per Government Code Sections 5115–51189. FHSZs in the Project Area are classified as Very High, High, and Moderate in State Responsibility Areas and Very High in Local and Federal Responsibility Areas. The Forestry Division of the LACoFD designates the VHFHSZs in the local responsibility areas.

In an effort to reduce the threats to lives and property, the LACoFD has instituted a variety of regulatory programs and standards for vegetation management, pre-fire management and planning, fuel modification, and brush clearance. In addition to these programs, the LACoFD and the County Department of Public Works enforce fire and building codes related to development in VHFHSZs. The Fire Department has access requirements for single family residential uses built in VHFHSZs. Access requirements for all other uses built within VHFHSZs are determined on a case-by-case basis.

In addition, several proposed policies of the Safety Element of the Proposed Project have been developed to address potential fire hazards.

- **Policy S 3.1:** Discourage high density and intensity development in VHFHSZs.
- **Policy S 3.4:** Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire-resistant building materials and vegetation.
- **Policy S 3.5:** Encourage the use of fire-resistant vegetation that is compatible with the area's natural vegetative habitats in fuel modification activities.
- **Policy S 3.6:** Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.
- **Policy S 3.7:** Site and design developments located within FHSZs, such as areas located near ridgelines and on hilltops, in a sensitive manner to reduce the wildfire risk.

The Proposed Project policies and conditions of approval for future development projects within the Project Area, in addition to compliance with applicable regulations, will minimize Proposed Project impacts related to wildland fires. Consequently, the overall associated impacts would be less than significant.

Finding:

All development within FHSZs is required to comply with applicable regulations by LACoFD, County Department of Public Works, and goals and policies under the Proposed Project. Impacts would be less than significant.

7. Hydrology and Water Quality

Impact 5.9-1	Implementation of the Proposed Project would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality.
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Support for this environmental impact conclusion is fully discussed starting on page 5.9-27 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Proposed Project buildout would involve soil disturbance, construction, and operation of developed land uses that could each generate pollutants affecting stormwater. Pollutants associated with stormwater include sediment, nutrients, bacteria and viruses, oil and grease, metals, organics, oxygen-demanding substances, pesticides, and trash and debris. However, construction projects of one acre or more would be required to comply with the General Construction Permit, Order No. 2012-0006-

DWQ, issued by the State Water Resources Control Board (SWRCB). Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 5.9-2 of the DEIR. Impacts would be less than significant upon compliance with regulatory requirements and Proposed Project policies.

Finding:

Existing regulations related to water quality and waste discharge would ensure development in accordance with the Proposed Project does not adversely affect existing conditions.

Impact 5.9-2 Future development pursuant to the Proposed Project would interfere with groundwater recharge.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-30 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Antelope Valley Planning Area

While substantial impervious areas would be added in the Antelope Valley Planning Area, the increase in impervious areas would still be a small fraction of the Planning Area. About 97.6 percent of the Planning Area is designated for either Open Space or Rural uses; the maximum permitted density in the Rural designation is one residential unit per acre. Therefore, buildout of the Antelope Valley Area Plan would not substantially interfere with groundwater recharge due to increase in impervious areas.

Santa Clarita Valley Planning Area

Impacts of buildout of the existing Santa Clarita Valley Area Plan in the Santa Clarita Valley Planning Area on groundwater recharge were identified as less than significant in the 2012 Certified EIR for that Area Plan.

Santa Monica Mountains Planning Area

About 97 percent of the existing Santa Monica Mountains North Area Plan in the Santa Monica Mountains Planning Area is designated either for public and open-space uses or for rural development. Thus, while buildout of this Area Plan would cause an increase in impervious areas, the increase would be minor compared to the over 20,000-acre Area Plan area and impacts would be less than significant.

The balance of the Planning Area is located within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Local Coastal Program (LCP) prohibits development in the most sensitive habitat areas. In addition, the LCP sets an absolute maximum residential building site area of 10,000 square feet for parcels exceeding an acre or 25 percent of parcels less than an acre. Thus, while some development could occur, the increase in impervious areas would be minor compared to the 52,000-acre area. Therefore, impacts would be less than significant.

Other Planning Areas

Developments in the unincorporated areas of other Planning Areas—Coastal Islands, East San Gabriel Valley, Gateway, Metro, San Fernando Valley, South Bay, West San Gabriel Valley, and Westside—would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas. Consequent impacts on groundwater recharge would be less than significant.

Finding:

Development would not significantly impact groundwater recharge in each of the Planning Areas.

Impact 5.9-3: Buildout of the Proposed Project would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-32 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Los Angeles Water Board Region

Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects in the unincorporated areas within the Los Angeles Regional Water Quality Control Board (RWQCB) Region and for which a Low Impact Development (LID) Plan are required must limit post-development, peak, stormwater-runoff discharge rates to no greater than the estimated predevelopment rate for developments where the increased peak, stormwater discharge rate will result in increased potential for downstream erosion. Construction projects in the Los Angeles Water Board Region of one acre or more in area must implement BMPs for erosion control and sediment control pursuant to the General Construction Permit.

Lahontan Water Board Region

Implementation of the Proposed Project would not substantially change drainage patterns in the Antelope Valley Watershed in the Lahontan Water Board Region. Requirements for erosion control and sediment control for construction projects and grading operations in the Lahontan Water Board Region would minimize impacts. Further, projects developed under the Proposed Project would comply with existing regulations for avoiding or minimizing erosion and sedimentation from such projects, and impacts would be less than significant.

Central Valley Water Board Region

The part of Los Angeles County in the Central Valley Water Board region is designated N-1 (Non-Urban 1) and C (Commercial) in the existing Antelope Valley Area Plan. Considering the small size of the portion of Los Angeles County in the Central Valley Water Board Region, buildout of the Proposed Project would not substantially change drainage patterns in that area. Any construction projects of one acre or more would be required to comply with the Statewide General Construction Permit. Impacts would be less than significant.

Finding:

Compliance with RWQCB regulations would ensure development impacts to existing drainage patterns are less than significant.

Impact 5.9-4: Development pursuant to the Proposed Project would not substantially change drainage patterns in Los Angeles County. While such developments could substantially increase rates or volumes of surface runoff, the developments would not result in flooding.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-33 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would not change drainage patterns in Los Angeles County or in parts of adjoining counties in watersheds extending from Los Angeles County into those counties. Under the MS4 Permits in the Los Angeles and Central Valley Water Board regions, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects within the Los Angeles RWQCB Region and subject to LID requirements are required must limit post-development peak stormwater runoff discharge rates to no greater than the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion. Developments pursuant to the Proposed Project would not substantially increase runoff rates or volumes and substantial consequent flood hazard would occur. Impacts would be less than significant.

Finding:

Permit requirements from RWQCBs would ensure that developments in accordance with the Proposed Project do not substantially increase volumes of surface runoff to cause flooding.

Impact 5.9-5: Implementation of the Proposed Project could place housing within 100-year flood hazard areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-33 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Portions of the County are located within 100-year flood zones. Although portions of these Planning Area within the current 100-year floodplain are proposed for development, future development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure be raised above the 100-year base flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the Proposed Project would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-6: Parts of the Project Area are within dam inundation areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-37 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Dam inundation areas span some unincorporated areas of all of the Planning Areas except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Most of the dams are flood control dams that do not impound substantial reservoirs for most of the year. After flood flows on an affected stream, water is released from a flood control dam at a controlled rate to create flood control capacity for the next storm. All dams also must meet safety requirements of, and are inspected annually by, the Division of Safety of Dams of the California Department of Water Resources.

About 74 percent of the net increase in population due to the Proposed Project would be in the Antelope Valley Planning Area. The dams in that Planning Area that have dam inundation areas spanning many square miles are Pyramid Lake in the Santa Clara Watershed; and San Gabriel Dam and Morris Dam in the San Gabriel River Watershed. The dam inundation areas for Fairmont Reservoir, Lake Palmdale, and Littlerock Reservoir each encompass limited areas directly below the respective dams. Thus, buildout of the existing Antelope Valley Area Plan would not subject large numbers of people to flood hazards from dam failure.

Net increases in population and employment in the remaining Planning Areas due to the Proposed Project would be relatively minor compared to the total numbers of residents and workers in those nine Planning Areas (in cities and unincorporated areas). Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, impacts would be less than significant.

Finding:

The Proposed Project would not put residents or workers at risk of dam inundation. Impacts would be less than significant.

Impact 5.9-7: Parts of the Project Area are subject to inundation by seiche, tsunami, or mudflow.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-37 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Seiche

The County would require risk assessments of flooding from failure of aboveground water storage tanks for projects downgrade from such storage tanks. Where such assessments determined that a proposed building would be affected by such flooding, either the building pad for the proposed development would be required to be raised above the flood elevation determined by the risk assessment; or improvements shall be made to the water tank to reduce the probability and/or

consequence of tank failure, where the owner and/or manager of an aboveground storage tank is willing to allow such improvements. Impacts would be less than significant.

Tsunami

Santa Monica Mountains Planning Area

Most of the unincorporated areas within the coastal zone of the Santa Monica Mountains Planning Area that is in tsunami inundation areas is designated Parks in the Malibu Local Coastal Land Use Plan. Therefore, buildout of the Proposed Project would not subject substantial additional numbers of people or structures to tsunami flood hazards.

Westside Planning Area

Marina del Rey is largely built out except for one vacant lot, about 4.1 acres in area, at the northeast corner of Via Marina and Tahiti Way, and designated for hotel use in the Marina del Rey Coastal Land Use Plan. Any hotel developed on that lot would prepare and maintain a hotel evacuation plan conforming with Los Angeles County Fire Department requirements. Therefore, buildout of the Proposed Project would not subject substantially increased numbers of people or structures to tsunami flood hazards. Impacts would be less than significant.

Mudflow

Antelope Valley Planning Area

About 74 percent of the net increase in population due to the Proposed Project buildout would be in the Antelope Valley Planning Area. Canyons in the northern slopes of the San Gabriel Mountains, and alluvial fans at the foot of the San Gabriel Mountains, are susceptible to mudflows.⁴ Such areas are mostly designated N-1 (Non-Urban; maximum density 0.5 residential unit per acre).

Santa Clarita Valley Planning Area

Canyons and areas along the bases of mountain slopes in the Santa Clarita Valley Planning Area are susceptible to mudflows. Much of such areas in the Planning Area are designated Open Space or Rural Land by the existing Santa Clarita Valley Area Plan; thus, most new development in this Planning Area would be directed away from such areas.

Geotechnical investigations would also be required for the development of structures for human occupancy pursuant to the Proposed Project. Where such geotechnical investigations identified mudflow hazard areas in or next to the sites of proposed structures or other improvements, the geotechnical investigations would include recommendations for minimizing such hazards. Compliance with recommendations of geotechnical investigations is required under the County Grading Code, Title 26, Appendix J of the County Code. Impacts would be less than significant after compliance with recommendations in geotechnical investigations.

Other Planning Areas

Development in the remaining nine Planning Areas would largely be limited to redevelopment or reuse of existing developed land. Only about 16 percent of the population growth due to the Proposed Project, and 54 percent of the employment growth would occur in these nine Planning Areas. Major employment-generating land uses are not located in canyons, and are rarely located

⁴ San Gabriel Mountains here also includes north-facing slopes of the Northern Transverse Ranges from State Route 14 (SR-14) to the west County boundary; the northwest edge of the San Gabriel Mountains is at Soledad Canyon (SR-14).

immediately below the bases of mountain slopes. Thus, redevelopments in these nine Planning Areas would not place substantial numbers of people at risk from mudflows.

Finding:

Development in accordance with the Proposed Project would not subject a substantial amount of people or structures to seiche, tsunami, or mudflow in the Project Area.

8. Land Use and Planning

Impact 5.10-1: Implementation of the Proposed Project would include construction of roads and other improvements that may divide an established community.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-33 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

As described in Chapter 3, *Project Description*, of this DEIR, most major land use and zoning changes planned for the unincorporated areas are concentrated in TODs, which contain established roadway networks and urbanized land use patterns. Targeted increases in development capacity in unincorporated areas are intended primarily to allow intensified development or a more flexible mix of land uses. The changes do not introduce radically different land uses into neighborhoods, propose new street patterns, or otherwise divide these areas. Although buildout calculations for the Proposed General Plan Update contain unbuilt development capacity on parcels outside areas planned for land use changes (see Tables 3.6 and 3.7 of the DEIR), this capacity, if developed, would generally occur along existing land use patterns. At a programmatic level, the Proposed Project does not allow land uses patterns that would result in division of an established neighborhood or community.

While policy maps included in the Land Use and Mobility Elements (i.e., Highway Plan Policy Map and Major Public Transit System) of the Proposed General Plan Update identify locations for TODs, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.

Finding:

Proposed changes under the General Plan Update would not divide established communities.

Impact 5.10-2: Implementation of the Proposed Project would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-35 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

The Proposed Project has been prepared in accordance with state planning law, as provided in California Government Code Section 65300. The Proposed General Plan Update is meant to be a framework for guiding planning and development in the Project Area through 2035 and beyond and can be thought of as the blueprint for Project Area's growth and development. The Proposed Project is consistent with California Government Code Section 65302 as it addresses all required General

Plan elements with the exception of the Housing Element which was adopted recently in February 2014 for the 2014-2021 planning period.

In addition, the proposed Land Use Policy Maps and the goals and policies in the updated elements strive to preserve and ensure land use compatibility throughout the Project Area. The proposed Land Use and Mobility Elements contain policies and implementation measures that help the County implement Assembly Bill (AB) 1358, include Policies M 1.1 through 1.3, which directly address implementing the “complete streets” transportation model.

Table 5.10-2 of the DEIR concludes that the Proposed Project would be consistent with the Southern California Association of Governments’ (SCAG’s) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Goals. Further, the Proposed General Plan Update would also be consistent with Gateway Cities Council of Governments, airport land use compatibility plans, and local coastal programs. Impacts would be less than significant.

Finding:

The Proposed Project would not conflict with the applicable land use plans (e.g., SCAG’s RTP/SCS) and impacts would be less than significant.

Impact 5.10-3: The Proposed Project would not conflict with adopted habitat conservation plans that apply to portions of the Antelope Valley and South Bay Planning Areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-42 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

There are two habitat conservation plans that apply to portions of Los Angeles County: the Palos Verdes Peninsula Natural Communities Conservation Plan (NCCP)/Habitat Conservation Plan (HCP), and the West Mojave Plan (WMP) HCP. An additional third HCP, the Desert Renewable Energy Conservation Plan (DRECP), is under development, but not yet adopted. The habitat conservation plans apply to portions of the Antelope Valley and South Bay planning areas.

Antelope Valley Planning Area

The intent of the West Mojave Plan HCP is to conserve habitat for special-status species in the Mojave Desert while creating a streamlined permit process that minimizes the need for individual consultations with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife. Although buildout of the Proposed Project would result in substantial growth and development in the West Mojave Plan HCP area, individual development projects in the Antelope Valley would be required comply with provisions of the West Mojave Plan HCP and other local, state, and federal regulations. Therefore, the Proposed Project does not conflict with the West Mojave Plan HCP.

South Bay Planning Area

Although the Palos Verdes Peninsula NCCP/HCP applies to a portion of the South Bay Planning Area, it is coterminous with a city and would not be affected by policies, land use designations, or infrastructure improvements identified in the Proposed Project. Therefore, the Proposed Project would not conflict with provisions of the Palos Verdes Peninsula NCCP/HCP.

In conclusion, the Proposed Project would not conflict with adopted habitat conservation plans because development would be required to comply with provisions of the NCCP/HCPs. Therefore, impacts would be less than significant.

Finding:

The General Plan Update would not conflict with existing habitat conservation plans.

9. Mineral Resources

Impact 5.11-3 Buildout of the Proposed Project would cause a loss of availability of oil and natural gas reserves in Los Angeles County.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-43 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

Oil and natural gas fields lie beneath large swaths of Los Angeles County. In the northern part of Los Angeles County, the largest of these fields are located in mountainous areas of the San Fernando Valley and Santa Clarita Valley Planning Areas, generally north of SR-118 and west of Interstate 5. Oil and gas fields are also located beneath substantial portions of the Los Angeles Basin, which spans parts of the Gateway, Metro, South Bay, and Westside Planning Areas. Additional oil and gas fields are located in the Chino Hills and Puente Hills, which traverse the East San Gabriel Valley, Gateway, and West San Gabriel Valley Planning Areas. The Los Angeles Basin alone has ten oil fields that each contains more than 1 billion barrels of oil (USGS 2013).

Many smaller oil fields in Los Angeles County have become inaccessible due to urban development. Buildout of the Proposed Project, which is anticipated to involve the development of 358,931 additional housing units and 4 million additional square feet of nonresidential space in the Project Area, would result in development of land above oil and natural gas reserves. This would result in reductions in availability of fossil fuel reserves.

However, buildout of the Proposed Project would not substantially reduce the regional availability of oil and natural gas, and it would not render any large oil fields completely inaccessible. Large oil fields in Los Angeles County are generally located within 1) cities (and therefore not in the Project Area), 2) unincorporated areas already built out with urban development (as in the Los Angeles Basin), 3) areas where both urban development and continued oil extraction are permitted (as in the Newhall Ranch Specific Plan area), and 4) areas where urban development above and/or near oil fields is neither permitted nor feasible (as in large areas of the Santa Clarita Valley Planning Area). Furthermore, development of residential, commercial, and other urban uses does not preclude the continued use of nearby oil wells. Therefore, the geographic scope of areas available for the extraction of oil and natural gas are not expected to be dramatically reduced by implementation of the Proposed Project. Impacts would be less than significant.

Finding:

Oil and natural gas reserves found in the County would not be adversely impacted by development of the Proposed Project. Impacts would be less than significant.

10. Noise

Impact 5.12-5: The proximity of future County developments to an airport or airstrip would not result in exposure of future resident and/or workers to airport-related noise.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-103 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would involve new development and redevelopment on parcels within the plan areas of adopted Airport Land Use Compatibility Plans (ALUCPs), including the comprehensive Los Angeles County ALUCP and the ALUCP for the General William J. Fox Airfield. However, future development under the Proposed Project would be required to be consistent with any applicable ALUCP constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the Proposed General Plan Update related to land use compatibility would ensure that development would not conflict with airport land use plans. In particular, Policy LU 7.6 explicitly requires consistency that airport land use plans address conflicts between airport operations and surrounding land uses. Policy N 1.12 requires that land use decisions on parcels adjacent to transportation facilities, including those adjacent to airports, consider existing and future noise levels of the adjacent transportation facilities. Therefore, with the application of Policy LU 7.6 and Policy N 1.12 and review by the Los Angeles County ALUC, future development under the Proposed Project would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels.

Finding:

By complying with adopted ALUCP regulations and goals and policies in the General Plan Update, future developments would not expose residents/workers to airport-related noises, and impacts would be less than significant.

11. Population and Housing

Impact 5.13-1: The Proposed Project would directly result in population growth in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.13-6 of Section 5.13, *Population and Housing*, of the DEIR.

Facts in Support of Finding:

The estimated buildout population of the Proposed Project is 2,356,890 residents, which is expected to occur sometime after 2035. SCAG projects the population in the Project Area to increase to 1,399,500 by 2035. The mixture of land uses and densities prescribed in the Proposed Project can accommodate the growth projected by SCAG by 2035; therefore, the project is consistent with SCAG's RTP/SCS.

The Proposed Project accommodates up to 659,409 housing units, and although buildout is not expected to occur by 2035, the opportunities for housing development provided in the Proposed Project are consistent with SCAG growth projections for 405,500 units by 2035. The housing and population growth allowed under the Proposed Project is consistent with SCAG projections and do not constitute a significant adverse environmental impact.

The Proposed Project buildout accommodates up to 467,736 jobs at full buildout. This growth is expected to occur over a long period of time, beyond the 2035 timeframe that is used by SCAG for planning purposes. However, the amount of growth allowed is consistent with SCAG's projection of 318,100 jobs by 2035.

As noted above, a jobs-housing ratio ranging between 1.3 to 1.7 is considered ideal (Ewing 1996). The majority of the Planning Areas become more balanced with implementation of the Proposed Project. Three Planning Areas, including the Coastal Islands, Santa Monica Mountains, and Westside Planning Areas, become less balanced. The Coastal Islands and Santa Monica Mountains Planning Areas are predominantly open space and not intended as primary growth areas. Therefore, small changes to jobs-housing balance in these areas are not considered significant. The Westside Planning Area becomes more housing-rich, but in terms of the surrounding cities, this is not considered significant because the Westside Cities Council of Governments (COG) subregion (which corresponds with the Westside Planning Area) as a whole is considered jobs-rich. The jobs-housing ratio for the Westside Cities COG subregion in 2010 was 2.12, which worsens to 2.24 in 2035 (SCAG 2012). As a result, implementation of the Proposed Project would improve the jobs-housing balance for the jobs-rich Westside Cities COG subregion by adding additional housing opportunities.

On November 12, 2014, the Los Angeles County Board of Supervisors approved the Antelope Valley Area Plan, which governs land use in the Antelope Valley Planning Area. Buildout of the recently approved Antelope Valley Area Plan would result in a job-housing balance of 1.3 for the Planning Area, which is considered a healthy balance of jobs and housing. Therefore, Mitigation Measure PH-1, as identified in the Draft EIR, is no longer required to mitigate Impact 5.13-1 since a balanced between jobs and housing has already been achieved through adoption of the Antelope Valley Area Plan.

Finding 1:

The Proposed Project would directly result in population growth in the Project Area. However, buildout of the Proposed Project would improve jobs-housing balance in most Planning Areas, and would not substantially reduce jobs-housing balance in the remaining Planning Areas. Therefore, this impact would be less than significant.

Impact 5.13-2: Project implementation would not result in the displacement of people and/or housing.

Support for this environmental impact conclusion is fully discussed starting on page 5.13-7 of Section 5.13, *Population and Housing*, of the DEIR.

Facts in Support of Finding:

The Project Area is developed with a variety of land uses including residential, commercial, industrial, and open space. However, the Proposed Project would allow existing uses to continue even where new zoning and land use designations are proposed under the Proposed Project. None of the existing uses would be forced to be removed or relocated as a result of the project implementation.

Further, compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the Regional Housing Needs Assessment (RHNA) and maintain an inventory of housing opportunities sites. The Housing Element includes enough adequate sites for 48,543 new homes, well above the RHNA of 30,145. Therefore, no significant impact is anticipated.

Finding:

Proposed zoning and land use designations would not impact existing residential uses; Impact 5.13-2 would be less than significant.

12. Public Services

Impact 5.14-2: Buildout of the Proposed Project would introduce new structures, residents and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-16 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

It is anticipated that the demand for law enforcement services would increase substantially above current levels due to development pursuant to the Proposed Project and the resulting increase in population. At buildout, an additional 1,316,958 residents would be located in the Project Area and require law enforcement services. Without additional staffing and facilities, the projected population increase would decrease the existing level of service of the Sheriff's Department. The need for additional staffing could result in the need to expand or construct new facilities in the unincorporated areas of the Santa Clarita Valley and Antelope Valley Planning Areas.

Using a desired officer-to-population ratio of one officer to every 1,000 residents, an additional 1,317 officers would be needed at buildout of the Proposed Project. As future development projects are implemented, LASD will review each project for potential impacts to their facilities and personnel. If determined to be necessary, mitigation will be imposed to fund capital facilities and equipment for the LASD. The Law Enforcement Fees required for north Los Angeles County, including Santa Clarita, Newhall, and Gorman will provide sufficient revenues to pay for land acquisition, engineering, construction, installation, purchasing, or any other direct costs for capital law enforcement facilities and equipment needed to serve the new development in the Santa Clarita Valley Planning Area.

Operational funding for the Sheriff's Department in Los Angeles County is derived from various types of tax revenue (e.g., property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the County's General Fund. A portion of these revenues would be allocated to the LASD during the County's annual budget process to maintain staffing and equipment levels to adequately serve project-related increases in service-call demands.

Currently, no mitigation fee has been adopted for the Antelope Valley Planning Area, which is expected to grow by approximately one million residents. However, tax revenues generated by new land uses in the Antelope Valley are anticipated to grow proportionally to the need for police services generated in that Planning Area. As described above, a portion of such General Fund revenues are allocated for Sheriff's services. Potential impacts in the remaining Planning Areas are not anticipated to be significant because of they are largely built out, with limited potential for growth.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.14-3: Buildout of the Proposed Project would generate new students who would impact the school enrollment capacities of area schools.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-24 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

A total of 257,919 additional students are anticipated at buildout of the Proposed Project. The majority of these students would be located in school districts serving the Antelope Valley and Santa Clarita Valley Planning Areas. The Proposed Project would result in housing and population growth throughout the Project Area, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required.

Implementation of the Proposed Project could contribute to a potentially significant adverse cumulative impact on school facilities and services. However, under state law, development projects are required to pay established school impact fees in accordance with Senate Bill (SB) 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute “full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities” (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the Proposed Project would be adequately mitigated by the payment of SB 50 fees.

Finding:

Fees associated with SB 50 would mitigate development impacts on school facilities to less than significant levels.

Impact 5.14-4: Buildout of the Proposed Project would generate additional population, increasing the service needs for the local libraries.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-33 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would result in the potential for increased demand for library services within the Project Area to the extent that expansion and construction of new facilities would be required. The projected increase in population at buildout of the Proposed Project is 1,316,958 persons. As discussed above, the current guideline for library facility space is a minimum of 0.5 gross square foot per capita and 2.75 items (books and other library materials) per capita. To adequately serve future residents within the Project Area, the County library system would need to add 3,621,635 library items and 658,479 square feet of library space.

Future development would generate new tax revenues, and as noted above, funding sources for the County Library consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library’s ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the

tax revenues collected would not adequately cover all the costs of serving the project population, and a significant impact on the library system would result.

To minimize potentially adverse effects, the County has devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the County-wide program to account for library-related construction and acquisition costs. Requiring payment of the library facilities fee in effect at the time development occurs (currently \$718.00 per unit of residential development) would mitigate project-related impacts on the County Library to a less than significant level.

Finding:

Library facilities fees collected for each residential development unit would reduce impacts to library facilities to less than significant levels.

13. Recreation

Impact 5.15-1: The Proposed Project would generate additional residents that would increase the use of existing parks and recreational facilities such that substantial physical deterioration may occur or be accelerated.

Support for this environmental impact conclusion is fully discussed starting on page 5.15-17 of Section 5.15, *Recreation*, of the DEIR.

Facts in Support of Finding:

An increase in population by 1,290,476 residents, regardless of location, would result in increased demand for recreational facilities, which has the potential to result in the deterioration of existing facilities. The Planning Areas most likely to experience substantial population growth under the Proposed Project include the Antelope Valley, Santa Clarita Valley, and Metro Planning Area. The remaining growth outside of the Antelope Valley and Santa Clarita Valley Planning Areas would occur in the unincorporated islands, which are surrounded by cities with a variety of local and regional recreational facilities.

The recreational acreage goal identified for local parks in the General Plan is four acres of local parkland per 1,000 residents and six acres of regional parkland per 1,000 residents. Recreational acreage goals serve as the baseline level of service standard that guides the planning and monitoring of recreational facilities. Acreage goals are used as planning tools; however, recreational facilities are not automatically considered deficient if these goals are not met.

Regional Parkland

There is a total of 68,986 acres of regional parkland in Los Angeles County. For every 1,000 residents, there are a total of approximately seven acres of regional parkland. Based on the General Plan's goal, there is a 10,074-acre surplus of regional parkland.

As discussed in Section 5.13, *Population and Housing*, Los Angeles County, at buildout, is expected to have a total population of 11,353,000. To meet the County's General Plan goal of six acres of regional parkland per 1,000 residents of the total population of Los Angeles County, a total of 68,118 acres of regional parkland would need to be available. There are currently 68,986 acres of regional parkland. At buildout, the ratio would be six acres of regional parkland per 1,000 Los Angeles County residents. This ratio meets the County's General Plan goal for regional parkland. Therefore, the 10,074-acre surplus of regional parkland is sufficient to accommodate the Proposed Project.

Local Parkland

The current ratio of local parkland is .57 acres of local parkland for every 1,000 residents. Based on the County's General Plan desired ratio of four acres of local parkland per 1,000 residents, there is currently a 3,657-acre deficit of local parkland within the unincorporated areas. Although there is an existing local park deficiency, the regional parkland reduces the demand for local park facilities. Moreover, the County-maintained trail system as well as other recreation facilities, including multi-benefit parks, school sites, city parks and facilities, private recreational facilities, greenways, and a variety of recreation programs tailored to the diverse needs of the population further reduce the demand for local park facilities.

The Proposed Project assumes an additional 1,290,476 people would reside in the Plan Area at buildout. To meet the General Plan goal for local parkland for the new population, the County would need 5,162 additional acres of local parkland. The County currently falls short of its goal for local parkland and would not be able to accommodate the Proposed Project's additional demand through existing local parkland inventory. Given the existing deficiency, the inability of the County to meet the General Plan goal of four acres of local parkland for every 1,000 residents upon buildout of the Proposed Project, would not in and of itself, result in a significant physical deterioration of recreation facilities. Increases in parkland acreage proportional to the increases in population (or sufficient increases in maintenance) would be adequate to assume that a substantial physical deterioration of facilities would not occur.

The extent to which the County can implement parks, trails, and other recreational facilities is related to the availability of funding. The Quimby Act is a funding mechanism for parkland acquisition. As allowed by this Act and pursuant to the County Code, residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the County to acquire a ratio of three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision assures that the funding for parkland acquisition will be proportional to increases in population. Other regulations including the Mello-Roos Community Facilities Act of 1982, the Landscaping and Lighting Act of 1972, as well as Los Angeles County Proposition A (Safe Neighborhood Parks Proposition of 1992 and 1996) would serve as supplemental sources of funding for parkland. Additionally, per Policy P/R 3.3, the County can require the provision of additional parks in communities with insufficient local parkland. The County can require a subdivider to dedicate land according to the General Plan standard of four acres of local parkland per 1,000 residents in unincorporated areas, and six acres of regional parkland per 1,000 residents in the unincorporated areas, per Los Angeles County Ordinance 2013-0009. Enforcement of the General Plan goal of four acres of local parkland for every 1,000 residents as a condition of approval where an appropriate nexus exist would serve to reduce the potential for deterioration of facilities by allowing for adequate funding.

In summary, while the current adopted County Code Section 21.24.340 standard is three acres of local parkland for every 1,000 residents, given the existing local parkland deficit, increases in parkland development and maintenance proportional to future increases in population would be sufficient to prevent a substantial deterioration of recreation facilities. As discussed above, adherence to the regulatory framework and County Codes would result in more than a 535 percent increase in local parkland through funding or dedication of land upon buildout of the Proposed Project. Further, as a condition of zone change approval, General Plan amendment, specific plan approval, or development agreement, the County shall work with a subdivider to dedicate land according to the General Plan goal of four acres of local parkland per 1,000 residents in the unincorporated areas, and six acres of regional parkland per 1,000 residents.

Therefore, existing regulations, Proposed General Plan Update policies, and Implementation Programs assure that the funding for parkland acquisition would be proportional to increases in population pursuant to the Quimby Act and impacts would be less than significant.

Finding:

Compliance with existing regulations and proposed policies and implementation programs under the General Plan Update would ensure impacts to County parklands are less than significant.

Impact 5.15-2: Implementation of the Proposed Project would result in the construction or expansion of recreational facilities.

Support for this environmental impact conclusion is fully discussed starting on page 5.15-24 of Section 5.15, *Recreation*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would require the construction and expansion of new recreational facilities to serve the forecasted population growth in the unincorporated areas. Although the Proposed Project does not specifically site or plan recreational facilities, it would allow for the development of future recreational facilities, including parks, trails, athletic fields, and golf courses, within many of the land use designations, including residential and mixed-use.

While the Proposed Project does recognize the need for additional recreational facilities, considering that the Proposed Project is a programmatic planning document, it does not contain actual development proposals with locations or project-specific details. Rather, the Proposed Project sets forth goals and policies, which are intended to guide the development of the unincorporated areas. Development pursuant to the Proposed Project would result in the construction of new or expansion of existing recreational facilities. Development and operation of new recreational facilities may have an adverse physical effect on the environment, including impacts relating to air quality, biological resources, lighting, noise, and traffic. Environmental impacts associated with construction of new and/or expansion of recreational facilities in accordance with the Proposed Project are addressed separately (see appropriate environmental topical areas in Chapter 5, Environmental Impacts). However, it is speculative to determine the location of proposed park facilities and impacts arising from the development of individual park projects. Goals, policies, and actions in the Proposed General Plan Update, including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Moreover, by directing the County to preserve historic and natural resources on County park properties, Policies P/R 5.1 and 5.3 would serve to reduce the potential for new or expanded facilities to result in adverse physical impacts. Finally, existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the Proposed Project. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the Proposed Project would not result in significant impacts relating to new or expanded recreational facilities.

Finding:

The Proposed Project would result in the construction or expansion of recreational facilities; however, development would be required to comply with existing federal, state, and local regulations to reduce potential impacts to less than significant levels.

14. Transportation and Traffic

IMPACT 5.16-2: Implementation of the Proposed Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-78 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The Proposed Project will result in a significant impact to air traffic patterns if it causes an increase in air traffic levels or introduce incompatible land uses. The Proposed Project will not result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. The Proposed Project has policies aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports and encouraging the development of a decentralized system of major airports.

Finding:

Proposed land uses under the General Plan Update would not impact air traffic patterns through increased traffic levels or other airport-related hazards.

IMPACT 5.16-3: Implementation of the Proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Support for this environmental impact conclusion is fully discussed starting on page 5.16-78 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The Proposed Project promotes highways to be built to specific standards that have been set by the County. These include increasing the number of lanes on major highways and other improvements under the Highway Plan. Hazards due to roadway design features will be evaluated on a project-by-project basis as the buildout of the Proposed Project occurs. All new highways and upgrades will be planned, designed and built to County standards.

The County periodically monitors levels of service, traffic accident patterns, and physical conditions of the existing street system, and upgrade roadways as needed. Additionally, the County applies consistent standards throughout the Highway Plan for street design to promote travel safety. It will accomplish this by designating roadways based on their functional classification, adopting consistent standard street cross sections, coordinating circulation plans of new development project with each other, and adopting common standards for pavement width. Within residential neighborhoods, complete streets will be promoted through traffic-calming devices, shorter block length, and other considerations. Where possible, local street patterns would be designed to create logical and understandable travel paths for users and discourage cut-through traffic.

Finding:

The proposed Highway Plan is consistent with County standards for street design and travel safety; impacts would be less than significant.

IMPACT 5.16-4: Implementation of the Proposed Project would not result in inadequate emergency access.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-79 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

Emergency access will be evaluated on a project-by-project basis as the buildout of the Proposed Project occurs. Buildout of the Proposed Project will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the Proposed Project will facilitate the consideration of the needs for emergency access in transportation planning. The County will maintain a current evacuation plan, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations.

Finding:

Development in accordance with the Proposed Project would be required to maintain adequate emergency access per County standards.

IMPACT 5.16-5: Implementation of the Proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Support for this environmental impact conclusion is fully discussed starting on page 5.16-79 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The 2012 Bicycle Master Plan (Bicycle Master Plan) was adopted by the County Board of Supervisors on March 13, 2012. The Bicycle Master Plan proposes approximately 831 miles of new bikeways throughout Los Angeles County. Along with the proposed bikeways, the Bicycle Plan recommends various bicycle-friendly policies and programs to promote bicycle ridership among users of all ages and skill sets within Los Angeles County. A Final Program EIR (State Clearinghouse No. 2011041004) for the Bicycle Master Plan was completed. The Bicycle Master Plan also contains elements that support alternative transportation programs, including increased ridership on public transit, developing mass transit as an alternative to automobile travel, the development of rail transit or exclusive bus lanes in high demand corridors, as well as research for and development of new transportation technologies.

The Proposed Project supports alternative modes of transportation, including walking and bicycling, to reduce total vehicle miles traveled (VMT). Additionally, the Proposed Project establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian

access between building entrances, sidewalks and transit stops. The Bicycle Master Plan also contains many programs and policies that would mitigate potential hazards or barriers for bicyclists.

Finding:

Implementation of the Proposed Project would be consistent with the adopted 2012 Bicycle Master Plan and would provide additional goals and policies in the General Plan Update related to pedestrian and bicyclist transportation opportunities.

15. Utilities and Service Systems

Impact 5.17-1: Wastewater generated by buildout of the Proposed Project would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-9 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Individual development projects built pursuant to the Proposed Project would be subject to the following construction and operational requirements:

Stormwater

Wastewater treatment requirements for discharges to stormwater are set forth in the Statewide General Construction Permit for discharges from construction sites of one acre or more in the Los Angeles, Santa Ana, and Central Valley RWQCB regions; such discharges within the portion of Los Angeles County in the Lahontan RWQCB region are regulated under Sections J110 and J111 of Title 26 of the Los Angeles County Code of Ordinances, and with Chapter 21 of the Los Angeles County Flood Control District Code.

In addition, the County has prepared the 2014 Low Impact Development Standards Manual (LID Standards Manual) to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175) henceforth referred to in this document as the 2012 MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

Sanitary Wastewater

Discharge limits for concentrations of hazardous materials discharged into sanitary sewers are set by wastewater treatment agencies. Wastewater treatment facilities can treat sanitary wastewater meeting discharge limits.

Wastewater Requiring Separate Treatment

Some industrial and agricultural operations require wastewater treatment separate from municipal wastewater treatment. For example, discharges to stormwater from operations of certain types of industrial facilities are regulated under the Statewide Industrial General Permit, Order No. 97-03-DWQ issued by the State Water Resources Control Board in 1997.

Discharges from some agricultural operations are regulated by RWQCBs. For instance, discharges from dairies in the Central Valley RWQCB region are regulated under several orders issued by the Central Valley RWQCB. Industrial and agricultural operations approved pursuant to the Proposed Project would comply with applicable waste discharge requirements.

Implementation of the Proposed Project would direct the majority of the anticipated population growth within the unincorporated areas into the northern portions of Los Angeles County (i.e., Antelope Valley and Santa Clarita Planning Areas). The demand for wastewater treatment capacity would increase as projects are built upon implementation of the Proposed Project. An increase in wastewater demand would require the need for new or expanded facilities to be constructed to meet the demand. In order to be permitted, new facilities would be required to meet the wastewater treatment requirements for the Los Angeles RWQCB and Central Valley RWQCB.

Development of the land uses proposed under the Proposed Project would exceed wastewater district capacities if proper planning does not occur for the updated land use plan in a timely manner. Proposed General Plan Implementation Program PS/F1, Planning Area Capital Improvement Plans, requires Department of Regional Planning (DRP) and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas (see also Planning Areas Framework Program). Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. Proposed General Plan Update Policy PS/F 4.2 requires the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the Proposed General Plan Update encourages development, such as TODs. Policy PS/F 4.4 requires the County to evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods. Therefore, implementation of the Proposed Project policies and required regulations would mitigate this impact and impacts would be less than significant.

Finding:

Compliance with existing RWQCB regulations would ensure wastewater quality and treatment capacities remain adequate and do not adversely affect existing conditions.

Impact 5.17-2: Sanitary wastewater generated by buildout of the Proposed Project could be adequately treated by the wastewater treatment providers serving the unincorporated areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-11 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Wastewater Generation

The net increase in wastewater generation by the Proposed Project is estimated at about 98 million gallons per day (mgd). All wastewater generation – from residential and nonresidential land uses – is estimated as 76 gallons per capita per day (gpcd). The percentage of total water use indoors is lower in warmer, drier regions, as a larger proportion of water use is outdoor use in such areas. Thus, the estimate below overstates wastewater generation in warmer, drier parts of Los Angeles County such as the Antelope Valley and Santa Clarita Valley.

Residual wastewater treatment capacity is capacity that is currently unused and is available to accommodate future growth. The residual capacities are calculated from capacities and average flows. As shown in Table 5.17-3 of the DEIR, currently there is not adequate residual wastewater treatment capacity in the Antelope Valley and Santa Clarita Valley Planning Areas to accommodate the projected net increase in wastewater generation due to Proposed Project buildout.

Pursuant to Implementation Program PS/F 1, *Planning Area Capital Improvement Plans*, in the Proposed General Plan Update, the DRP and DPW are directed to jointly secure sources of funding and set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas (see also LU-1, *Planning Areas Framework Program*). Each Capital Improvement Plan shall include the following, as needed:

- Sewer Capacity Study;
- Transportation System Capacity Study;
- Waste Management Study;
- Stormwater System Study;
- Public Water System Study;
- list of necessary infrastructure improvements;
- Implementation Program; and
- Financing Plan.

Implementation Program PS/F 1 would ensure adequate treatment capacity is available in the Antelope Valley Planning Area to service future development and that impacts of buildout of the Antelope Valley Area Plan on wastewater treatment capacity would be less than significant. The impacts of the buildout of the Antelope Valley Area Plan on wastewater treatment capacity were thoroughly analyzed in the certified Program EIR for the Antelope Valley Area Plan (certified November 12, 2014). Impacts were identified as less than significant in the certified Antelope Valley Area Plan Program EIR. The analysis and less than significant impact conclusion is incorporated by reference in the FEIR.

The impacts of the buildout of the Santa Clarita Valley Area Plan on wastewater treatment capacity were thoroughly analyzed in the certified Program EIR for the Santa Clarita Valley Area Plan. Impacts were identified as less than significant in the certified Santa Clarita Valley Area Plan Program EIR. The analysis and less than significant impact conclusion is incorporated by reference in the FEIR.

Funding for Capital Improvements

Capital improvements to Los Angeles County Sanitation District (LACSD) water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. The Connection Fee Program ensures that all users pay their fair share for any necessary expansion of the system (Raza 2013). Estimated wastewater generation factors used in determining connection fees in the LACSD's 22 member Districts are set forth in the Connection Fee Ordinance for each respective District available on LACSD's website.

Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. There is sufficient wastewater treatment capacity in the remaining Planning Areas. Impacts would be less than significant.

Finding:

Wastewater generation would be adequately treated by existing wastewater treatment facilities within the County. Impacts would be less than significant.

Impact 5.17-4: Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-57 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Generation of solid waste would increase as the population increases with buildout of the Proposed Project. Correspondingly, there would be a need for additional landfill capacity and related support facilities.

Both the forecasted net increase in solid waste generation by Proposed Project buildout, about 5.81 million pounds per day (2,904 tons per day), and the forecast total solid waste generation in unincorporated County areas at Proposed Project buildout – about 10.6 million pounds per day (5,300 tons per day) are well within the total residual 30,926 tons per day daily disposal capacity of the nine landfills serving the County. By comparison, total solid waste generation from Los Angeles County in 2013 is estimated at about 44.8 million pounds – or 22,400 tons – per day. The County would maintain 15 years' identified disposal capacity in conformance with AB 939. Proposed Project buildout would not require construction of new or expanded landfills, and impacts would be less than significant.

Finding:

Compliance with solid waste regulations would ensure development in accordance with the Proposed Project would not adversely impact the County's landfill capacities.

Impact 5.17-5: Existing and/or proposed facilities would be able to accommodate project-generated utility demands.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-63 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Electricity

Growth in the unincorporated areas would result in additional demand for electricity service. Total electricity demands in Southern California Edison (SCE)'s service area were 82,069 gigawatt-hours (GWH) per year in 2012, and are forecast to increase to 96,516 GWH in 2024 (CEC 2013); one GWH is equivalent to one million kilowatt-hours. Implementation of the Proposed Project would result in increased demand in electricity service to the unincorporated areas. New development occurring from buildout of the Proposed Project would be subject to Title 24, Part 6 of the California Administrative code, the Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires local jurisdiction to use energy efficient appliances, weatherization techniques and efficient cooling and heating systems to reduce energy demand stemming from new development.

The forecasted net increase in electricity demand due to Proposed Project buildout is about 9.9 billion kWh per year, or about 10,300 GWH per year, and is within SCE's demand forecast for its service area. Therefore, impacts of Proposed Project buildout on electricity supplies would be less than significant.

Natural Gas

The estimated net increase in natural gas demand by Proposed Project buildout is about 192 million therms per year, that is, 51 million cubic feet of natural gas per day. Forecasted natural gas demands due to the Proposed Project buildout are within Southern California Gas Company (SCGC)'s estimated supplies; thus, impacts of the Proposed Project buildout on natural gas supplies would be less than significant.

Finding:

Electricity and natural gas supplies would be able to meet project-generated utility demands and impacts would be less than significant.

B. IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the EIR, these impacts would be considered less than significant.

1. Air Quality

Impact 5.3-5: Placement of new sensitive receptors near major sources of toxic air contaminants in the unincorporated areas could expose people to substantial pollutant concentrations.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-39 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Because placement of sensitive land uses falls outside the California Air Resource Board (CARB) jurisdiction, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to address the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. Antelope Valley Air Quality Management District (AVAQMD) identifies the following project types (and associated buffer distance) that would require further evaluation to ensure that sensitive receptors would not be exposed to substantial pollutant concentrations:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

Table 5.3-15 of the DEIR shows a summary of CARB recommendations for siting new sensitive land uses within the vicinity of air-pollutant-generating sources. Recommendations in Table 5.3-15

are based on data that show that localized air pollution exposures can be reduced by as much as 80 percent by following CARB minimum distance separations.

There are three carcinogenic toxic air contaminants that constitute the majority of the known health risks from motor vehicle traffic: diesel particulate matter (DPM) from trucks and benzene and 1,3 butadiene from passenger vehicles. Potential sources of toxic air contaminants (TACs) in the unincorporated areas include stationary sources permitted by the Southern California Air Quality Management District (SCAQMD) and AVAQMD and roadways with more than 100,000 average daily traffic volumes. Other near roadway pollutants includes ultrafine particles (UFPs). UFPs have also been shown to be toxic and have health impacts. UFPs are emitted from almost every fuel combustion process, including diesel, gasoline, and jet engines, as well as external combustion processes such as wood burning. Consequently, there is growing concern that people living in close proximity to highly trafficked roadways and other sources of combustion-related pollutants (e.g. airports and rail yards) may be exposed to significant levels of UFPs and other air toxics. However, UFPs are not specifically regulated since the U.S. Environmental Protection Agency (USEPA) and CARB have yet to adopt ambient air quality standards (AAQS)(SCAQMD 2012).

The Land Use Element of the Proposed General Plan Update identifies land use compatibility as a major consideration in the siting of new sensitive land uses. The General Plan also addresses land use compatibility by mapping and regulating uses and intensities, and by including policies and programs that mitigate land use conflicts through design, such as the use of landscaping, walls, building orientation, and performance standards. Implementation of the Proposed Project policies would ensure that review of air quality compatibility would be conducted when siting receptors near major sources. However, placement of sensitive receptors proximate to the sources above is considered a potentially significant impact of the Proposed Project.

Mitigation Measure:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

AQ-3 Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:

- Industrial facilities within 1000 feet
- Distribution centers (40 or more trucks per day) within 1,000 feet
- Major transportation projects (50,000 or more vehicles per day) within 1,000 feet
- Dry cleaners using perchloroethylene within 500 feet
- Gasoline dispensing facilities within 300 feet

Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-

cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County and shall be verified by the County Department of Regional Planning.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County of Los Angeles hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Impact 5.3-6: Industrial land uses associated with the Proposed Project could create objectionable odors.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-43 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Growth in the unincorporated areas could generate new sources of odors and place sensitive receptors near existing sources of odors. Nuisance odors from land uses in the SoCAB are regulated under SCAQMD Rule 402, *Nuisance*, while odors within the Antelope Valley portion of the MDAB are regulated under AVAQMD Rule 402, *Nuisance*. Major sources of odors include wastewater treatment plants, chemical manufacturing facilities, food processing facilities, agricultural operations, and waste facilities (e.g., landfills, transfer stations, compost facilities).

There are two types of odor impacts: 1) siting sensitive receptors near nuisance odors, and 2) siting new sources of nuisance odors near sensitive receptors. The Proposed Project designates residential areas and industrial areas of the unincorporated areas to prevent potential mixing of incompatible land use types.

- Future non-industrial development would involve minor odor-generating activities, such as lawn mower exhaust and application of exterior paints for building improvement. It should be noted that while restaurants can generate odors, these sources are not typically identified as nuisance odors since they typically do not generate significant odors that affect a substantial number of people.

- Industrial uses, including food processing facilities and waste transfer stations, have the potential to generate substantial odors. Individual projects associated with the Proposed Project, including commercial, industrial, and office, are also required to comply with SCAQMD's or AVAQMMD's Rule 402 to prevent public nuisances. While these odors would be required to be controlled, additional measures may be warranted to prevent a nuisance, depending on the nature of the proposed use. Consequently, industrial land uses associated with the buildout of the Proposed Project may generate odors that affect a substantial number of people.
- Construction activities would require the operation of equipment that may generate exhaust from either gasoline or diesel fuel. Construction and development would also require the application of paints and the paving of roads, which could generate odors. These types and concentrations of odors are typical of developments and are not considered significant air quality impacts.

SCAQMD and AVAQMMD Rule 402, Nuisance, requires abatement of any nuisance generated by an odor complaint. Because existing sources of odors are required to comply with SCAQMD's or AVAQMMD Rule 402, impacts to siting of new sensitive land uses would be less than significant. Future environmental review for major sources of odors are required to ensure that sensitive land uses are not exposed to nuisance odors. Rule 402 also requires abatement of any nuisance generating an odor complaint.

Implementation of Proposed Project policies would ensure that review of odor impacts of a project. However, industrial land uses associated with buildout of the Proposed Project may generate odors that affect a substantial number of people.

Mitigation Measure:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

AQ-4 If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County's regulations. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, greenwaste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the

industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County of Los Angeles hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

2. Biological Resources

Impact 5.4-3: The Proposed Project would impact federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-112 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Los Angeles County supports a number of major water bodies (e.g., Castaic Lake, Los Angeles River, San Gabriel River, Santa Clara River) as well as smaller streams and tributaries that support important riverine and riparian habitat, including wetlands. Three key agencies regulate activities within inland streams, wetlands, and riparian areas in California: the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and RWQCB. Any project that involves permanently or temporarily impacting jurisdictional waters and/or wetlands through filling, stockpiling, construction access, conversion to a storm drain, channelization, bank stabilization, road or utility line crossings, geotechnical investigations, or any other modifications that involve the discharge of fill and/or alteration of a jurisdictional resource, will likely require permits from the USACE, CDFW, and/or RWQCB, before any land disturbance can commence. Both permanent and temporary impacts are regulated by the resource agencies.

The Proposed Project would incorporate the proposed SEAs, which are designed to identify the Project Area's most sensitive biological resources, inclusive of riparian habitats and wetland areas. Future proposed development should be sited and designed to ensure consistency with the objectives for resource protection within each specific SEA. However, the SEAs do not guarantee preservation, nor do they protect all wetland habitat occurring within Los Angeles County.

Development of properties adjacent to riparian communities or other wetland habitats should be designed to protect water quality and the riverine biological ecological functions. Protection of wetland habitats where they occur through Los Angeles County will assist in the preservation of these resources within Los Angeles County. Additionally, the Conservation and Natural Resources Element of the Proposed General Plan Update outlines policies for the protection of biological resources, including wetlands. Implementation of these policies will have both direct and indirect beneficial effects for wetlands by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to wetland areas.

In addition, as part of the Implementation Programs outlined in the Conservation and Natural Resources Element, the intended programs to help achieve the goals and policies of the Proposed

General Plan Update include the SEA Preservation Program, Mitigation Land Banking Program, OWCMP Implementation, Native Woodlands Conservation Management Plan, Habitat Conservation Plan, and Open Space Land Acquisition Strategy (as referenced in Chapter 16: General Plan Implementation Program).

However, the buildout of the Proposed Project may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality.

Mitigation Measure:

- BIO-1 Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). For proposed discretionary projects within SEAs, a biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).
- BIO-2 If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as mentioned in Mitigation Measure BIO-1) shall include mitigation measures requiring pre-construction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate offsite habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County of Los Angeles hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

3. Cultural Resources

Impact 5.5-2: Buildout of the Proposed Project could destroy archaeological or paleontological resources or a unique geologic feature.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-20 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

The Project Area is considered potentially sensitive for archaeological and paleontological resources. Ground disturbance from development of projects pursuant to the Proposed Project could impact known and unknown archaeological sites and fossils buried in soils. However, existing federal, state, and local regulations address: the provision of studies to identify archaeological and paleontological resources; application review for projects that would potentially involve land disturbance; project-level standard conditions of approval that address unanticipated archaeological and or paleontological discoveries; and requirements to develop specific mitigation measures if resources are encountered during any development activity. The Conservation and Natural Resources Element in the Proposed General Plan Update contains policies that address the management of artifacts (see Policy C/NR 14.1) and the notification and inventory of archeological and paleontological resources (Policies C/NR 14.6).

Review and protection of archaeological and paleontological resources is also afforded by CEQA for individual projects subject to discretionary actions that are implemented in accordance with the proposed land use plan. Per section 21083.2 of CEQA, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the EIR shall address the issue of those resources. Nevertheless, the potential to uncover undiscovered archeological and paleontological resources is high. In the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, a qualified archaeologist would assess the find and develop a course of action to preserve the find, as indicated in Mitigation Measures CUL-4 and CUL-5.

Mitigation Measures:

CUL-4 Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.

If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation

and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.

Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).

- CUL-5 Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.

If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.

Unanticipated discoveries shall be evaluated for significance by a County-certified paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are

identified in the form of the mitigation measure above. The County of Los Angeles hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

4. Public Services

Impact 5.14-1: Buildout of the Proposed Project would introduce new structures, residents and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-10 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

The population and housing increase projected under the Proposed Project would increase the demands on the Los Angeles County Fire Department (LACoFD) to provide fire protection and emergency services. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. Existing County policies and regulations and Proposed Project goals and policies are intended to reduce impacts associated with fire protection facilities. Specifically, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment. As new development occurs, fees would be collected to ensure adequate levels of service for fire protection are maintained. Therefore, the Proposed Project is not anticipated to result in a potentially significant impact to fire protection or emergency services with construction or expansion of fire protection facilities and compliance with the mitigation measures listed below.

Mitigation Measures:

- PS-1 Prior to issuance of building permits, future project applicants/developers shall pay the Los Angeles County Fire Department Developer Fee in effect at that time.
- PS-2 Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code. The required fire apparatus road and water requirements shall be in place prior to construction.
- PS-3 Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code and approved by LACoFD prior to building permit issuance.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County of Los Angeles hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

C. SIGNIFICANT UNAVOIDABLE IMPACTS

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or mitigation would lessen impacts to less than significant. The following impact would remain significant and unavoidable:

1. Agriculture and Forestry Resources

Impact 5.2-1: Buildout of the Proposed Project would convert California resource agency-designated farmland to non-agricultural land uses.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-27 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Antelope Valley Planning Area

Existing land use designations on Important Farmland under the Antelope Valley Area Plan are classified into designations compatible or incompatible with continued agricultural use. Approximately 85 percent of the total acreage of the three categories of farmland evaluated—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, is in land use designations incompatible with intense commercial agriculture.

However, buildout of the Proposed Project is not likely to result in the construction of urban development on all of the mapped Important Farmland in the Antelope Valley Planning Area, especially where continued operation of agricultural activities remains permitted and economically viable. However, CEQA requires that analysis evaluate the effects of all development capacity allowed on applicable parcels. As detailed in Section 5.2, *Agriculture and Forestry Resources*, of the DEIR, if development capacity were fully utilized, 20,773 acres of Important Farmland would be developed with nonagricultural uses. This would represent a substantial conversion of resource agency-designated farmland to non-agricultural land uses. Conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses due to buildout of the Proposed Project would be a significant impact in the Antelope Valley Planning Area.

Santa Clarita Valley Planning Area

Important Farmland would be converted to non-agricultural land uses by buildout of the Santa Clarita Valley Area Plan, which is coterminous with the Santa Clarita Valley Planning Area. However, the following area plan policies would reduce impacts to agricultural land through preservation:

- **Policy LU 1.1.7:** Preserve and protect important agricultural resources, including farmland and grazing land, through designating these areas as Rural Land on the Land Use Map where appropriate.
- **Policy CO 10.1.9:** Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other open space that provides nature carbon sequestration benefits.

Santa Monica Mountains Planning Area

Unlike the Antelope Valley Planning Area and Santa Clarita Valley Planning Area, the Santa Monica Mountains Planning Area does not have an Area Plan. The Santa Monica Mountains North Area Plan applies to the northern portion of the Planning Area and the remaining portion is located within the Coastal Zone.

Under the Proposed Project, hypothetical buildout of allowed nonagricultural uses (such as residential units) within the Santa Monica Mountains Planning Area would be incompatible with continued agricultural operations. All of the Prime Farmland, and over 88 percent of the Unique Farmland in the Planning Area would be converted to non-agricultural land uses at buildout. This represents a substantial conversion of mapped Important Farmland to non-agricultural uses, and would result in a significant impact in the Santa Monica Mountains Planning Area.

Conclusion

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to non-agricultural uses. However, Agricultural Resource Areas (ARAs) would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Therefore, conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses due to buildout of the Proposed Project would be a potentially significant impact in the Antelope Valley Area Planning Area and Santa Monica Mountains Planning Area. In the remaining nine Planning Areas, impacts would be less than significant.

Mitigation Measure:

No mitigation measures are available that would reduce impacts of conversion of mapped Important Farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped Important Farmland due to implementation of a project. The proposed ARA program and related policies in the Proposed General Plan Update (Policies C/NR 8.1 through C/NR 8.3) would encourage the continued use of farmland for agricultural operation. However, the ARAs would not be agricultural preserves and would not guarantee the preservation of farmland. Impacts would be significant and unavoidable.

The California Court of Appeal has held that a mitigation measure requiring an agricultural land mitigation bank does not actually avoid or reduce the loss of farmland subject to development (*Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956). Therefore, an Agricultural Land Mitigation Bank is not a valid form of mitigation for farmland conversion impacts. Since then, two other California appellate courts have issued conflicting rulings on whether preservation of offsite farmland mitigates conversion of farmland on a project site to non-agricultural uses. The three rulings are unpublished and are not legal precedents, but do include arguments that might be used in future legislation or court opinions on this topic. One of the rulings, *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) by the Sixth District Appellate Court, found that preservation of offsite farmland does not mitigate conversion of farmland by a project because it does not create new farmland or offset the loss of farmland due to the project. The other ruling, *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) by the Third District Court, disagreed with the earlier two rulings. The last ruling stated that conservation fees can mitigate for the loss of agricultural lands by diminishing development pressures due to the conversion of farmland and reducing the domino effect created by projects. The question of whether offsite preservation of farmland mitigates conversion of farmland to non-agricultural uses has yet to be settled by the courts or the legislature.

As most of Los Angeles County is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or lack of soil suitability), use of such mitigation would require acquisition of land outside of Los Angeles County. Therefore, mitigation banks and similar programs designed to offset the loss of agricultural land are considered infeasible.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.2-5: Buildout of the Proposed Project would involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forest land to nonforest use.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-33 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Agricultural use can be incompatible with some other land uses—such as residential, school, hospital, and day care uses—due to pesticide use, noise, dust emissions, and odors. Buildout of the Proposed Project would involve development of non-agricultural uses along many edges of Important Farmland areas, as well as within some Important Farmland areas. New nonagricultural uses may develop around existing agricultural uses, creating pressure for them to be converted to nonagricultural uses.

Antelope Valley Planning Area

Most of the areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland within the Antelope Valley Planning Area are surrounded by Nonurban-1 (N-1) designation, which permits a wide range of land uses intended for remote areas including residential development at a density of up to 0.5 residential units per acre. Agriculture is permitted in the N-1 designation. However, analysis of impacts to farmland under CEQA generally focuses on intensive commercial agriculture rather than small-scale farms or grazing land. It is assumed that residential densities higher than 0.2 units per acre—or, one unit per five acres—are incompatible with intensive commercial agriculture. Thus, buildout of land surrounding existing mapped Important Farmland within the Antelope Valley Planning Area under the existing Antelope Valley Area Plan would contribute to pressure to convert mapped farmland to non-agricultural uses.

Santa Clarita Valley Planning Area

Impacts arising from land use incompatibility between agricultural uses and urban uses were identified as significant and unavoidable in the Certified EIR for the Santa Clarita Valley Area Plan for the Santa Clarita Valley Planning Area. That finding is incorporated into the DEIR by reference.

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Buildout of the Proposed Project based on the existing Antelope Valley Area Plan in the Antelope Valley Planning Area and on the existing Santa Clarita Valley Area Plan in the Santa Clarita Planning Area would have a significant indirect impact on conversion of mapped Important Farmland to non-agricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses. Such indirect impacts would be less than significant in the other nine Planning Areas.

Mitigation Measure:

Similar to Impact 5.2-1, no feasible mitigation measures beyond the goals and policies already incorporated into the Proposed Project are feasible to reduce impacts to farmland that would result from implementation of the Proposed Project.

Buildout of the Proposed Project would indirectly result in the conversion of mapped important farmland to non-agricultural uses in the Antelope Valley and Santa Clarita Valley Planning Areas. Although goals and policies have been incorporated into the Proposed Project to protect farming operations from urbanization, these goals and policies cannot ensure that additional conversion of farmland will not occur.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

2. Air Quality

Impact 5.3-1: Buildout of the Proposed Project would generate more growth than the Existing General Plan; therefore, the project would be inconsistent with SCAQMD's and AVAQMD's air quality management plans.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-28 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Antelope Valley Air Quality Management District (AVAQMD) and Southern California Air Quality Management District (SCAQMD) consider a project consistent with the air quality management plan if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled are deemed to not exceed this threshold (SCAQMD 1993 and AVAQMD 2011). SCAG projections for the unincorporated areas are partially based on the Existing General Plan within the 2012 Regional Transportation Plan/Sustainable Communities Strategy

(RTP/SCS). The horizon year for the 2012 RTP/SCS is 2035. Buildout of the Proposed Project would result in higher population and generate more employment for the unincorporated areas than SCAG forecasts.

Although individual development projects would be consistent with the control measures/regulations identified in SCAQMD's 2012 AQMP and AVAQMD's Ozone Attainment Plan, the Proposed Project would generate substantially more growth for the unincorporated areas than the 2035 forecast. However, buildout of the Proposed Project would slightly reduce per capita VMT. Full buildout associated with the Proposed Project is not currently included in the emissions inventory for the South Coast Air Basin (SoCAB) or Antelope Valley portion of the Mojave Desert Air Basin (MDAB). Thus, the Proposed Project would not be consistent with the air quality management plans because buildout of the unincorporated areas under the Proposed Project would exceed the forecasts in the air quality attainment plans. Consequently, the Proposed Project would cumulatively contribute to the existing nonattainment designations in the SoCAB and Antelope Valley portion of the MDAB because these emissions are not included in the current regional emissions inventory for the SoCAB and MDAB, respectively. The Proposed Project would be considered inconsistent with the SCAQMD's AQMP and AVAQMD's Ozone Attainment Plan, resulting in a significant impact in this regard.

Mitigation Measure:

Mitigation measures incorporated into future development projects and adherence to the Proposed Project policies for operation and construction phases described under Impacts 5.3-2 and 5.3-3 would reduce criteria air pollutant emissions associated with buildout of the Proposed Project. Goals and policies in the Proposed Project would facilitate continued County participation/cooperation with SCAQMD, AVAQMD, and Southern California Association of Governments (SCAG) to achieve regional air quality improvement goals, promote energy conservation design and development techniques, encourage alternative transportation modes, and implement transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plans due to the magnitude of growth and associated emissions that would be generated by the buildout of the unincorporated areas in accordance with the Proposed Project.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-2: Construction activities associated with the Proposed Project would generate a substantial increase in short-term criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-30 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Construction activities associated with development that would be accommodated by the Proposed Project would occur over the buildout horizon (post-2035) of the Proposed Project and cause short-term emissions of criteria air pollutants. The primary source of NO_x, CO, and SO_x emissions is the operation of construction equipment. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions are activities that disturb the soil, such as grading and excavation, road construction, building demolition and construction, off-road vehicle exhaust. The primary source of volatile organic compounds (VOC) emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of the Proposed Project, emissions would likely exceed the SCAQMD and AVAQMD regional significance thresholds and therefore, in accordance with the SCAMQD and AVAQMD methodology, would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB, respectively. The MDAB is currently designated nonattainment for O₃ and particulate matter (PM_{2.5}). The SoCAB is designated nonattainment for O₃, PM_{2.5}, and lead (Los Angeles County only) under the California and National Ambient Air Quality Standards (AAQS) and nonattainment for PM₁₀ and NO₂ under the California AAQS.^{5, 6} Emissions of VOC and NO_x are precursors to the formation of O₃. In addition, NO_x is a precursor to the formation of particulate matter (PM₁₀ and PM_{2.5}). Therefore, the Proposed Project would cumulatively contribute to the existing nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Air quality emissions related to construction must be addressed on a project-by-project basis. For this broad-based Proposed General Plan Update, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of SCAQMD's or AVAQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory measures (e.g., new source review, permit to operate, rules for fugitive dust control, and CARB's airborne toxic control measures), mitigation may include extension of construction schedules and/or use of special equipment. The following Proposed Project policies would reduce construction-related criteria air pollutant emissions to the extent feasible:

- **Policy AQ 1.3:** Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.
- **Policy PS/F 5.7:** Encourage the recycling of construction and demolition debris generated by public and private projects.

⁵ CARB approved the SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards during the period from 2004 to 2007. In June 2013, the USEPA approved the State of California's request to redesignate the South Coast PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013.

⁶ CARB has proposed to redesignate the SoCAB as attainment for lead and NO₂ under the California AAQS (CARB 2014).

Nevertheless, because of the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the Proposed Project, at least some projects would likely continue to exceed the relevant SCAQMD and AVAQMD thresholds. Consequently, construction-related air quality impacts associated with development in accordance with the Proposed Project are deemed significant.

Mitigation Measure:

AQ-1 If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable air quality management district (AQMD) adopted thresholds of significance, the County Department of Regional Planning shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:

- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.

Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-3: Long-term operation of the Proposed Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-32 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

New development in accordance with the Proposed Project would increase air pollutant emissions in the unincorporated areas and contribute to the overall emissions inventory in the SoCAB and Antelope Valley portion of the MDAB.

SCAG RTP/SCS Horizon Year 2035

The increase in criteria air pollutant emissions for the SCAG RTP/SCS horizon year 2035 scenario is based on the difference between existing land uses and an estimate of population and employment within Los Angeles County at 2035 based on SCAG forecasts (SCAG 2012).

Tables 5.3-11 and 5.3-12 of the DEIR shows a forecast of the unincorporated areas criteria air pollutant emissions inventory in horizon year 2035 compared to the daily and annual emissions thresholds, respectively. As shown, the Proposed Project at SCAG RTP/SCS horizon year 2035 would generate long-term emissions that exceed the daily SCAQMD thresholds and the annual AVAQMD thresholds for all criteria pollutants except SO_x. The Antelope Valley portion of the MDAB is currently designated nonattainment for O₃ and particulate matter (PM_{2.5}). The SoCAB is designated nonattainment for O₃, PM_{2.5}, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for PM₁₀ and NO₂ under the California AAQS.^{7, 8} Emissions

⁷ CARB approved the SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards during the period from 2004 to 2007. In June 2013, the USEPA approved the State of California's request to redesignate the South Coast PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013.

of VOC and NO_x are precursors to the formation of O₃. In addition, NO_x is a precursor to the formation of particulate matter (PM₁₀ and PM_{2.5}). Therefore, the Proposed Project would cumulatively contribute to the existing nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Proposed Project Buildout

The increase in criteria air pollutant emissions for the full buildout scenario is based on the difference between existing land uses and land uses associated with buildout of the Proposed Project. Buildout of the Proposed Project is not linked to any development timeframe. The timeframe of buildout would extend far beyond the 2035 horizon year. Tables 5.3-13 and 5.3-14 show a forecast of the unincorporated areas criteria air pollutant emissions inventory in post-2035 compared to the daily and annual emissions thresholds, respectively. As shown, buildout of the Proposed Project would generate long-term emissions that exceed the daily SCAQMD thresholds and the annual AVAQMD thresholds for all criteria pollutants. Therefore, the Proposed Project would cumulatively contribute to the existing nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Conclusion

As identified above, criteria air pollutants generated throughout the lifetime of the Proposed Project would exceed the significance thresholds of SCAQMD and AVAQMD and cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portions of the MDAB. Implementation of Proposed Project policies would reduce impacts to the extent feasible. Nonetheless, operational-related air quality impacts associated with future development that would be accommodated by the Proposed Project are significant.

Mitigation Measure:

Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of residential, office, commercial, industrial, and warehousing land uses in the unincorporated areas, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds.

Finding 3:

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

⁸ CARB has proposed to redesignate the SoCAB as attainment for lead and NO₂ under the California AAQS (CARB 2014).

Impact 5.3-4: Buildout of the Proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-37 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Operation of new land uses, consistent with the land use plan of the Proposed Project, would generate new sources of criteria air pollutants and TACs.

Localized Significance Thresholds

SCAQMD and AVAQMD consider projects that cause or contribute to an exceedance of the California or National AAQS to result in significant impacts. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with future development projects. Due to the scale of development activity associated with buildout of the Proposed Project, emissions could exceed the SCAQMD and AVAQMD regional significance thresholds and therefore, in accordance with the SCAQMD and AVAQMD methodology, may result in significant localized impacts. Air quality emissions would be addressed on a project-by-project basis. For this broad-based Proposed General Plan Update, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated by the Proposed Project, at least some projects would likely exceed the AAQS.

Toxic Air Contaminants

Operation of new land uses, consistent with the Proposed Project, could also generate new sources of TACs within the unincorporated areas from various industrial and commercial processes (e.g., manufacturing, dry cleaning). Stationary sources used as emergency power supply to communication equipment could also generate new sources of TACs and particulate matter (PM₁₀, PM_{2.5}, and UFP). Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD or AVAQMD include industrial land uses, such as chemical processing facilities, dry cleaners, and gasoline-dispensing facilities. In addition to stationary/area sources of TACs, warehousing operations could generate a substantial amount of diesel particulate matter emissions from off-road equipment use and truck idling. New land uses in the unincorporated areas that generate trucks trips (including trucks with transport refrigeration units) could generate an increase in DPM that would contribute to cancer and non-cancer health risk in the SoCAB or Antelope Valley portion of the MDAB. These new land uses could be near existing sensitive receptors within the unincorporated areas.

Stationary sources of emissions would be controlled by SCAQMD or AVAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD's or AVAQMD's New Source Review, as described above. Because the nature of those emissions cannot be determined at this time and they are subject to further regulation and permitting, they will not be addressed further in this analysis but are considered a potentially significant impact of the Proposed Project.

AVAQMD identifies project types (and associated buffer distance) that would require further evaluation to ensure that sensitive receptors would not be exposed to substantial pollutant concentrations. In addition, implementation of the Proposed Project policies would ensure that

review of air quality compatibility would be conducted when siting receptors near major sources. However, operation of new sources of emissions near existing or planned sensitive receptors is considered a potentially significant impact of the project.

Mitigation Measure:

AQ-2 New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

3. Biological Resources

Impact 5.4-1: Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-105 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Los Angeles County supports at least 159 special-status plant species and 133 special-status wildlife species. The natural communities, as well as somewhat disturbed semi-natural communities, that are found throughout Los Angeles County have the potential to support one or more of these sensitive species.

The Proposed Project would incorporate the proposed Significant Ecological Area (SEAs), which are designed to identify Los Angeles County's most sensitive biological resources. In conjunction with the update to the SEA Ordinance, which is part of the Proposed Project, the most sensitive biological resources will be provided a level of protection through the planning process. Future proposed development should be sited and designed to ensure compatibility with the objectives for resource protection within each specific SEA. However, the SEAs do not guarantee preservation, nor do they protect all habitats potentially supporting special-status species. Rather, they are a planning tool to provide a higher level of scrutiny for those areas and resources of greatest biological concern within the County. The update to the SEA Ordinance would replace the adopted Hillside Management and Significant Ecological Areas Ordinance that was adopted in 1982 (a separate proposed update to the Hillside Management Ordinance is also part of the Proposed Project).

The update to the SEA Ordinance incorporates development standards that would reduce potential direct and indirect impacts associated with proposed development. Landscaping standards would prohibit the use of invasive plant species. Outdoor lighting standards would conform to the regulations of the rural outdoor lighting districts. Fencing standards would limit the use of wildlife impermeable designs to developed areas. Fuel modification of habitable structures would limit vegetation removal in dedicated open space areas. Connectivity standards would prohibit the further constriction of wildlife linkages and corridors. Associated with approval of development entitlements within a designated SEA, a development project will be required to provide habitat preservation and opens space dedication in proportion to the area of SEA habitat to be developed and impacted. The updated SEA Ordinance development standards will also provide for preservation and protection of streams, drainages, wetlands and other water features.

Additionally, the Conservation and Natural Resources Element of the Proposed General Plan Update outlines several policies for the protection of biological resources. Implementation of these policies will have both direct and indirect beneficial effects for special-status species by emphasizing avoidance and minimization of impacts to habitats (e.g., by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas) and encouraging greater protection for habitat and resources. However, the buildout of the Proposed Project will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). As a consequence, buildout of the Proposed Project will have a significant adverse effect on special-status species.

Mitigation Measure:

Mitigation Measures BIO-1 and BIO-2 above would also apply to this impact.

Finding:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.4-2: Development of the Proposed Project would result in the loss of riparian habitat or sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-109 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Los Angeles County supports 24 sensitive plant communities and four aquatic communities as reported in the California Natural Diversity Database (CNDDB). The Proposed Project would incorporate the proposed SEAs, which are designed to identify the County's most sensitive biological resources, including riparian habitat and sensitive plant communities. Future proposed development should be sited and designed to ensure consistency with the objectives for resource protection within each specific SEA. However, the SEAs do not guarantee preservation, nor do they protect all riparian habitat and sensitive plant communities found within Los Angeles County.

The update to the SEA Ordinance assigns habitat values to the various habitats contained within the proposed SEAs and requires greater habitat preservation ratios for proposed development within the highest value habitats, especially those associated with riparian communities. The update to the SEA Ordinance includes provisions for habitat preservation to be contiguous with other preserved areas and dedicated as natural open space areas in perpetuity. In a similar manner, the update to the Hillside Management Area (HMA) Ordinance is intended to minimize development of the steepest slopes, which often sustain valuable wildlife habitat. The discretionary review process for development entitlements will require compliance with the updated SEA and HMA Ordinances for those projects located such areas.

Additionally, the Conservation and Natural Resources Element of the Proposed General Plan Update outlines policies that relate to the protection of riparian habitat and sensitive plant communities. Implementation of these policies will have both direct and indirect beneficial effects for riparian habitat and sensitive plant communities by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats.

In addition, as part of the Implementation Programs outlined in the Conservation and Natural Resources Element, the intended programs to help achieve the goals and policies of the Proposed General Plan Update include the SEA Preservation Program, Mitigation Land Banking Program, OWCMP Implementation, Native Woodlands Conservation Management Plan, Habitat Conservation Plan, and Open Space Land Acquisition Strategy (as referenced in Chapter 16: General Plan Implementation Program).

However, the buildout of the Proposed Project will impact various habitat types, including riparian habitat and other sensitive plant communities. Thus, buildout of the Proposed Project will have a significant adverse effect on these resources.

Mitigation Measure:

Mitigation Measures BIO-1 and BIO-2 above would also apply to this impact.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.4-4: The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-115 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

As discussed above, Los Angeles County supports seven regional wildlife linkages: San Gabriel – Castaic Connection, San Gabriel – San Bernardino Connection, Santa Monica – Sierra Madre Connection, Sierra Madre – Castaic Connection, Tehachapi Connection, Antelope Valley Connection, and the Puente Hills – Chino Hills Connection. There are 11 linkages along principal water courses, 9 linkages along ranges of mountains and hills, and an important linkage along the San Andreas Fault.

All of these regional wildlife linkages are at least partially within one or more SEA. The Proposed Project would incorporate the updated SEA boundaries, which are designed to identify Los Angeles County's most sensitive biological resources as well as provide linkages and corridors to promote regional species movement. However, the SEAs do not guarantee preservation, and future proposed development should be sited and designed to ensure compatibility with the objectives for resource protection within each specific SEA.

The Conservation and Natural Resources Element of the Proposed General Plan Update outlines policies for the protection of biological resources. Implementation of these policies will have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in

previously disturbed areas. However, the buildout of the Proposed Project will impact regional wildlife linkages and may impact nursery sites. Thus, buildout of the Proposed Project will have a significant adverse effect on wildlife movement and nursery sites.

Mitigation measure BIO-1 and the update to the SEA Ordinance may provide some protection measures to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the Proposed Project do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, impacts to wildlife movement remain significant at the General Plan level.

Mitigation Measure:

BIO-3 No feasible mitigation measures are available that would reduce impacts to wildlife movement completely. However, corridors shall not be entirely closed by any development, and partial mitigation shall be mandatory for impact on wildlife corridors and wildlife nursery sites. This shall include provision of a minimum of half the corridor width. (The width shall be at least what is needed to remain connective for the top predators using the corridor.) Mitigation can include preservation by deed in perpetuity of other parts of the wildlife corridor connecting through the development area; it can include native landscaping to provide cover on the corridor. For nursery site impacts, mitigation shall include preservation by deed in perpetuity for another comparable nursery site of the same species.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

4. Cultural Resources

Impact 5.5-1: Development pursuant to the Proposed Project could impact historic resources.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-19 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would not directly demolish or materially alter historic resources. However, identified historic structures and sites that are eligible or potentially eligible for National Register of Historic Resources listing may be vulnerable to development activities in accordance with the Proposed General Plan Update. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. Additionally, infrastructure or other improvements could result in damage to or demolition of other historic features. Although approximately 31 historical resources in the unincorporated areas have been designated, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA.

There are a number of federal, state, and local policies, regulations, and institutions in place to protect historical resources in Los Angeles County. In addition, the Proposed General Plan Update contains numerous policies that specifically address sensitive historical resources and their protection in the Conservation and Natural Resources Element and the Parks and Recreation Element.

Compliance with the goals, policies, and implementation measures of the Proposed Project would reduce impacts to historical resources. Project-level environmental compliance procedures would identify historic resources that could be affected by a proposed project and to encourage the avoidance of known historic resources to the extent feasible through project siting and design. When historic resources cannot be avoided, use of the Secretary of the Interior's Standards would be expected to mitigate impacts to a less than significant level.

However, the above policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the Proposed Project. Thus, impacts are considered significant and unavoidable.

Mitigation Measures:

- CUL-1 Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.
- CUL-2 Draft a comprehensive historic preservation ordinance for the unincorporated areas.
- CUL-3 Prepare an Adaptive Reuse Ordinance within the context of, and in compliance with, existing building codes that considers the conversion of older, economically distressed or historically-significant buildings into multifamily residential developments, live-and-work units, mixed use developments, or commercial uses.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for

highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

5. Greenhouse Gas Emissions

Impact 5.7-1 Buildout of the Proposed Project would generate GHG emissions that would have a significant impact on the environment.

Support for this environmental impact conclusion is fully discussed starting on page 5.7-27 of Section 5.7, *Greenhouse Gas Emissions*, of the DEIR.

Facts in Support of Finding:

Development under the Proposed Project would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas.

SCAG RTP/SCS Horizon Year 2035

The community-wide GHG emissions inventory for the unincorporated areas in 2035 compared to existing conditions is detailed in Table 5.7-6 of the DEIR. The horizon year 2035 inventory includes reductions from federal and state measures identified in CARB's Scoping Plan, including the Pavley fuel efficiency standards, low carbon fuel standards (LCFS) for fuel use (transportation and off-road), and state reductions for non-transportation measures identified in the Community Climate Action Plan (CCAP) by 2020. While local reductions are not included in the horizon year 2035 inventory because the CCAP is not yet adopted, these reductions are shown in Table 5.7-6.

As identified in Table 5.7-6, the unincorporated areas would experience an increase of 575,559 MTCO₂e of GHG emissions in 2035 compared to existing (2010) conditions. GHG emissions in the unincorporated areas would exceed 100,000 tons (90,718 MTCO₂e/year) during this time frame. In addition, the County would not achieve the SCAQMD per capita efficiency target for 2035, which is 4.0 MTCO₂e/SP and the Proposed Project would be 4.6 MTCO₂e/SP. Impacts would be significant for short-term growth anticipated under the Proposed Project. It should be noted that if the CCAP is adopted, the GHG emissions in the unincorporated areas would decrease by approximately 380,833 MTCO₂e. However, the County would still not achieve the interim 2035 efficiency target. Additional state and local actions are necessary to achieve the post-2020 GHG reduction goals for the State.

Post-2035: Proposed Project Buildout

The community-wide GHG emissions inventory for the unincorporated areas at buildout (post-2035) compared to existing conditions is detailed in Table 5.7-7 of the DEIR. The post-2035 inventory includes reductions from federal and state measures identified in CARB's Scoping Plan, including the Pavley fuel efficiency standards, LCFS for fuel use (transportation and off-road), and state reductions for non-transportation measures identified in the CCAP by 2020. While local reductions are not included in the post- 2035 inventory because the CCAP is not yet adopted, these reductions are shown in Table 5.7-7.

Compared to the unincorporated areas' existing emissions inventory, the unincorporated areas would experience a substantial increase of 5,266,994 MTCO₂e of GHG emissions at buildout.

Consequently, GHG emissions in the unincorporated areas would exceed 100,000 tons (90,718 MTCO₂e/year) by full buildout of the Proposed Project. In addition, the County would not achieve the SCAQMD per capita efficiency target for post-2035 based on the goal of Executive Order S-03-05, which is to reduce GHG emissions to 80 percent below 1990 levels by 2050. Impacts would be significant for long-term growth anticipated under the Proposed Project.

Community Climate Action Plan

The County identified a GHG reduction target of at least 11 percent below 2010 levels by 2020. The CCAP identifies local actions to reduce community-wide GHG reductions in 2020 to reach the GHG reduction goal for the unincorporated areas. Implementation of the CCAP would not result in an increase in GHG emissions. Implementation of local measures in the CCAP would reduce emissions and therefore be a beneficial GHG impact. Therefore, no impact would occur.

Mitigation Measures:

GHG-1 The County shall monitor GHG emissions by updating its GHG emissions inventory every five years. Upon the next update to the CCAP, the inventory, GHG reduction measures, and GHG reductions should be forecasted to 2035 to ensure progress toward achieving an interim target that aligns with the long-term GHG reduction goals of Executive Order S-03-05. The CCAP update should take into account the reductions achievable due to federal and state action as well as ongoing work by the County government and the private sector. The 2035 CCAP update shall be complete by January 1, 2021 with a plan to achieve GHG reductions for 2035 or 2040 provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed CCAP (building energy, transportation, waste, water, wastewater, agriculture and others) will likely be necessary. Future targets should be considered in alignment with state reduction targets, as feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the CCAP should account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.7-2 Implementation of a Community Climate Action Plan is necessary to achieve the GHG reduction targets for the unincorporated areas of Los Angeles by AB 32 target year 2020.

Support for this environmental impact conclusion is fully discussed starting on page 5.7-30 of Section 5.7, *Greenhouse Gas Emissions*, of the DEIR.

Facts in Support of Finding:

CARB Scoping Plan

In accordance with AB 32, CARB developed the Scoping Plan to outline the State's strategy to achieve 1990 level emissions by year 2020. Since adoption of the 2008 Scoping Plan, state agencies have adopted programs, and the legislature has passed additional legislation to achieve the GHG reduction targets. Projects within the unincorporated County areas would be required to adhere to the following programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32.

The Proposed Project is consistent with the statewide GHG reduction policies. Local actions identified in the Proposed Project include incorporating a multi-modal transportation system into the Mobility Element and ensuring that the Land Use Policy Map for the unincorporated areas connects the transportation to land uses. Mobility management is an important component of a multi-modal transportation and a strategy for improving congestion and reducing VMT. Strategies include infrastructure to support liquid natural gas (LNG), compressed natural gas (CNG), and hydrogen vehicles; Intelligent Transportation Systems (ITS); and electric car plug-in ports. In addition, the County's transportation demand management (TDM) policies include strategies that encourage changes travel behavior and discourage single occupant drivers. TDM policies include congestion management pricing, offering employer-based transit passes or increasing transit availability; regional carpooling programs; and parking management. Consequently, impacts associated with development of the Proposed Project would be less than significant.

Further, to achieve the local goals identified in CARB's 2008 Scoping Plan, the Proposed Project included the CCAP. The CCAP identifies and evaluates feasible and effective policies to reduce GHG emissions in order to reduce energy costs, protect air quality, and improve the economy and the environment. The policies identified in the CCAP represent the County's actions to achieve the GHG reduction targets of AB 32 for target year 2020. A consistency analysis with the goals and actions of the Proposed General Plan Update is shown in Table 5.7-8 of the DEIR and concludes that the Proposed Project would include policies and actions consistent with the CCAP. While the CCAP identifies that the County would achieve the local GHG reduction goals under AB 32, the CCAP has not yet been adopted. Since the local actions identified in the CCAP are necessary to meet the GHG reduction target for the County in 2020, GHG emissions impacts are conservatively considered significant for the Proposed Project.

SCAG's 2012 RTP/SCS

The Proposed Project incorporates several key strategies, including establishment of Transit Oriented Districts (TODs) coupled with the multi-modal transportation system in Los Angeles County, to align with the goals of SCAG's 2012 RTP/SCS. The following TODs are within the unincorporated areas and are within a half-mile radius of a major transit stop:

- Aviation/LAX Station TOD (Metro Green Line)
- Hawthorne Station TOD (Metro Green Line)

- Vermont Station TOD (Metro Green Line)
- Rosa Parks Station TOD (Metro Green Line/Blue Line)
- Slauson Station TOD (Metro Blue Line)
- Florence Station TOD (Metro Blue Line)
- Firestone Station TOD (Metro Blue Line)
- Del Amo Station TOD (Metro Blue Line)
- Sierra Madre Villa Station TOD (Metro Gold Line)
- Third Street TOD Corridor (Metro Gold Line)
- 110 Freeway/Carson Station TOD (connection to Metro Silver Line)

The Proposed Project includes a TOD Implementation Program that requires the preparation of future TOD specific plans, or similar mechanisms for land uses near transit. An important goal of a TOD specific plan includes increasing walking, bicycling, and transit ridership and reducing VMT (Policies LU 1.11 through LU 1.15, M 1.5, ED 2.5, ED 2.7, ED 3.1, and ED 4.4). Consequently, the impacts from consistency with SCAG's 2012 RTP/SCS are less than significant.

Mitigation Measure:

No mitigation measures are available to reduce impacts associated with AB 32 GHG reduction targets for year 2020. However, adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

6. Mineral Resources

Impact 5.11-1: Implementation of the Proposed Project would cause the loss of availability of known mineral resources in the Antelope Valley Planning Area but not in the other 10 Planning Areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-39 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would change land use designations identified as Mineral Resource Zone 2 (MRZ-2), mineral resource sectors, or as active mines.

Antelope Valley Planning Area

Of the 15,882 acres of MRZ-2 area in the existing Antelope Valley Area Plan, 1,823 acres, or 11.5 percent, are designated for land uses incompatible with mining. Those designations are Airport (1,634 acres), C-Commercial (9 acres), M-Industry (15 acres), U1-Urban (165 acres). Impacts to mineral resources in the Planning Area are significant.

Santa Clarita Valley Planning Area

Buildout of the existing Santa Clarita Valley Area Plan would result in 952 acres of land uses incompatible with mining. The balance of MRZ-2 areas within the Area Plan is designated Specific Plan; compatibility with mining would depend on specific allowed land uses within each specific plan and is not evaluated in the DEIR. However, the Santa Clarita Valley Area Plan provides policies relevant to maintaining availability of mineral resource (Policy CO 1.3.3, 2.3.1, 2.3.2 through 2.3.4, and LU 7.7.1). The Certified EIR for the Santa Clarita Valley Area Plan concluded that implementation of the Area Plan policies would limit impacts on mineral resources to less than significant, and no mitigation measures for impacts to mineral resources were required.

San Fernando Valley Planning Area

The proposed land use designation in the two MRZ-2 areas is RL20 (Rural Land, 20 acres minimum per single-family residence). Because RL20 designation maintains nearly the entire area as open space, buildout of the Proposed Project in these two small areas would not substantially reduce availability of mineral resources.

Existing Altadena Community Plan

All of the existing designations for land mapped MRZ-2 in the Altadena Community Plan area (within the West San Gabriel Valley Planning Area) are for land uses incompatible with mining: Business Park, Institutions, Low-Density Residential, and Right-of-Way. However, well over three-quarters of the MRZ-2 area within the Altadena Community Plan are already developed. Considering the small amount of vacant land designated MRZ-2 in the Community Plan area that could be developed pursuant to Proposed Project buildout, approximately 4.5 acres, impacts of Proposed Project buildout on mineral resources in the Altadena Community Plan area would be less than significant.

West and East San Gabriel Valley Planning Areas

Unincorporated areas designated MRZ-2 in the West San Gabriel Valley Planning Area are built out with residential uses and a golf course. Buildout of the Proposed Project in the West San Gabriel Valley Planning Area would not impact availability of mineral resources.

Mineral Resource Sectors in this Planning Area are in the cities of Irwindale and Arcadia; no sectors are in unincorporated areas. All of the active mines in this Planning Area are in the City of Irwindale. Buildout of the Proposed Project would not involve land use changes within mineral resource sectors or on active mines.

Westside, South Bay, Santa Monica Mountains, and Gateway Planning Areas

No MRZ-2 areas or mineral resource sectors present in the Westside, South Bay, Santa Monica Mountains, or Gateway Planning Areas, and no impact would occur.

Metro Planning Area

Since the MRZ-2 area in the Metro Planning Area is built out with urban land uses, buildout of the Proposed Project would have no impact on availability of mineral resources in this Planning Area. No changes in land use designations are proposed in the Proposed Project in unincorporated areas within areas designated MRZ-2 in the Metro Planning Area. No impact would occur.

Mitigation Measure:

No mitigation measures are available that would reduce impacts of Proposed Project buildout in the Antelope Valley Planning Area to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources due to buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.11-2 Buildout of the Proposed Project would cause a loss of availability of mineral resources in one mineral extraction area identified in the Existing General Plan: the Little Rock Wash in the Antelope Valley Planning Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-43 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would substantially reduce availability of mineral resources in one mineral extraction area identified in the Existing General Plan: the Little Rock Wash area in the Antelope Valley Planning Area. This impact would be potentially significant. No significant impacts would occur to other mineral extraction areas identified in the Project Area.

Mitigation Measure:

No mitigation measures are available that would reduce impacts of Proposed Project buildout in the Antelope Valley Planning Area to less than significant. Mineral resources and extraction areas are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources due to buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

7. Noise

Impact 5.12-1: Construction activities would result in temporary noise increases in the vicinity of the Proposed Project.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-57 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would result in construction of new residential, commercial, and industrial uses throughout Los Angeles County. Two types of temporary noise impacts could occur during construction. First, the transport of workers and movement of materials to and from the individual work sites could incrementally increase noise levels along local access roads. The second type of temporary noise impact is related to demolition, site preparation, grading, and/or physical construction. Construction is performed in distinct steps, each of which has its own mix of equipment, and, consequently, its own noise characteristics.

Construction equipment generates high-levels of noise with maximums ranging from 71 dBA to 101 dBA. Construction of individual developments associated with the buildout of the Proposed Project would temporarily increase the ambient noise environment and would have the potential to affect noise-sensitive land uses in the vicinity of an individual project. County Code Section 12.08.440 allows for construction activities during the specified hours of 7:00 AM to 7:00 PM on weekdays (including Saturdays), but restricts such activities on Sundays or holidays. Furthermore, this code section restricts noise levels by both equipment type (i.e., mobile or stationary) and receptor land use classification type. However, construction activities may occur outside of these hours if the County determines that the emergency maintenance, repair, or improvement of public service utilities is needed or if a variance is issued by the health officer.

Significant noise impacts may occur from operation of heavy earthmoving equipment and truck haul that would occur with construction of individual development projects. Implementation of the Proposed Project anticipates an increase in development intensity. Construction noise levels are dependent upon the specific locations, site plans, and construction details of individual projects, which have not yet been developed. Construction would be localized and would occur intermittently for varying periods of time. Because specific project-level information is not available at this time, it is not possible to quantify the construction noise impacts at specific sensitive receptors. Construction of individual developments associated with implementation of the Proposed Project would temporarily increase the ambient noise environment in the vicinity of each individual project. Because construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged

periods of time, construction noise impacts associated with implementation of the Proposed Project are considered significant.

Mitigation Measure:

- N-1 Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures such as installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.12-2 Buildout of the Proposed Project would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-59 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Future development in accordance with the Proposed Project would cause increases in traffic along some roadways. Noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas. Commercial and industrial areas are not considered noise sensitive and have much higher tolerances for exterior noise levels. The “normally unacceptable” minimum noise level for considered noise-sensitive land uses is 70 dBA Community Noise Equivalent Level (CNEL). For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dB or more and the ambient noise level under with-project conditions is 70 dBA CNEL or higher (i.e., those with-project conditions that fall within the “Normally Unacceptable” or “Clearly Unacceptable” land use categories). Additionally, a significant impact would also occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 5 dB or more regardless of the ambient noise level under with-project conditions.

As shown in Table 5.12-18 in the DEIR, seven of the 10 Planning Areas would have noise impacted roadways. Buildout of the Proposed Project could result in noise level increases of up to 19.6 dB. The existing noise-sensitive receptors along these roadways include single- and multi-family residential land uses in addition to schools healthcare facilities. Individual projects associated with buildout of the Proposed Project would occur over a period of many years and the increase in noise on an annual basis would not be readily discernable as traffic and noise would increase incrementally.

Implementation of several Proposed General Plan Update Noise Element policies would reduce impacts to the extent feasible. However, cumulative increases in the ambient noise environment along the roadway segments identified from buildout of the proposed land use plan would be substantial. Additionally, there are no other reasonably feasible measures to reduce traffic noise impacts to existing uses either due to implementation constraints, aesthetics drawbacks, and/or costs considerations⁹. Therefore, traffic noise impacts to existing noise-sensitive receptors (along the above-noted roadway segments) would experience a substantial increase in noise over existing conditions, would meet the significance criteria, and would be exposed to potentially significant noise levels due to traffic flows.

Mitigation Measure:

Implementation of the Proposed Project policies would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.12-3 New noise-sensitive land uses associated with Proposed Project could be exposed to elevated noise levels from mobile sources along roadways.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-81 of Section 5.12, *Noise*, of the DEIR.

⁹ These may include, but not be limited to, such concerns as driveway openings in sound walls, 10 to 16 foot tall sound wall heights, hundreds (or thousands) of miles of sound barrier walls, hundreds (or thousands) of miles of repaving with 'quiet' pavement technologies.

Facts in Support of Finding:

Table 5.12-19 of the DEIR shows the 65, 70, and 75 dBA CNEL noise contours of roadways within Los Angeles County in future buildout year conditions.¹⁰ For the purpose of assessing the compatibility of new development with the anticipated ambient noise, the County utilizes the State's Community Noise and Land Use Compatibility standards. New sensitive land uses would have to demonstrate compatibility with the ambient noise levels. A potentially significant impact could occur if the Proposed Project designates noise-sensitive exterior land uses in areas where the ambient noise level exceeds 65 dBA CNEL. Likewise, interior noise levels in habitable noise-sensitive areas should not exceed 45 dBA CNEL.

The Proposed General Plan Update contains policies related to minimizing noise land use compatibility impacts (Policies N 1.1 through 1.7, and 1.9 through 1.12). Implementation of Proposed General Plan Update policies would reduce impacts to the extent feasible. However, additional measures would be required during specific, project-level assessments to ensure that future land uses are compatible to their noise environment. Therefore, impacts related to noise land use compatibility are considered potentially significant.

Mitigation Measure:

- N-2 Prior to the issuance of building permits for any project that involves a noise-sensitive use within the 65 dBA CNEL contour (i.e., areas in or above 65 dBA CNEL) along major roadways and freeways the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls), and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling) to ensure compliance with the County's Noise Compatibility Criteria and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

¹⁰ The buildout year noise contours are shown in Appendix K of the EIR.

Impact 5.12-4: The Proposed Project could create elevated levels of groundborne vibration and groundborne noise; both in the short-term (construction) and the long-term (operations).

Support for this environmental impact conclusion is fully discussed starting on page 5.12-103 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Railroad Vibration Impacts

Vibration levels in Los Angeles County from trains are dependent on site-specific conditions such as geology and the condition of the railroad track and train wheels. Although it is not proposed at this time, if modifications of existing rail tracks are planned, vibration would be addressed in the environmental review for each individual rail improvement project.

Implementation of the Proposed Project may add new sensitive uses in areas adjacent to existing and future railroad lines. These developments may result in placing residential or other sensitive uses near the railroad lines which could result in excessive groundborne vibration from train operations. The extent of the exposure to vibration depends on site-specific conditions, location of buildings, and size and design of the proposed buildings. Further specific, project-level review would be required as future developments are proposed. Potential exposure to groundborne vibration is significant.

Industrial Vibration Impacts

The use of heavy equipment associated with industrial operations can create elevated vibration levels in its immediate proximity. Soil conditions have a strong influence on the levels of groundborne vibration and, as a result, vibration typically dissipates rapidly with distance away from the source. Further specific, project-level review would be required as future developments are proposed. Potential exposure to groundborne vibration is significant.

Construction Vibration Impacts

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. Vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the Federal Transit Administration (FTA) Criteria for human annoyance of 78 vibration decibels (VdB) and structural damage of 0.200 in/sec. Impacts may occur from construction equipment vibration associated with development in accordance with the Proposed Project. This would be a significant impact.

Mitigation Measure:

- N-3 New development that occurs within 200 feet of a railroad track (according to the FTA's vibration screening distances) shall be evaluated for potential vibration impacts. The project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features and/or required building construction improvements to ensure that vibration impacts would remain below acceptable levels of 0.08 RMS in/sec for residential uses.
- N-4 Individual projects that use vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be

perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administrations vibration annoyance criterion of 78 VdBat sensitive receptor locations), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).

- N-5 Prior to the issuance of building permits, proposed heavy industrial projects are required to provide evidence that vibration due to the operation of machinery would not adversely affect nearby vibration sensitive uses such as commercial, hotel, institutional, and residential uses. The project property owner/developers shall retain an acoustical engineer to conduct a vibration analysis and identify, where appropriate, project design features and/or required building/ equipment improvements to ensure that vibration impacts would remain below acceptable levels of 78 VdB at sensitive receptor locations. This vibration level is considered to be significant at vibration-sensitive uses. This can be accomplished with vibration-reducing measures such as, but not limited to, equipment placement, equipment selection, vibration dampers, and/or changes to operation modes (speed, power, frequency).

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

8. Transportation and Traffic

Impact 5.16-1: Buildout in accordance with the Proposed Project would impact levels of service on the existing roadway system.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-73 of Section 5.16, Transportation and Traffic, of the DEIR.

Facts in Support of Finding:

Intersection Levels of Service (LOS)

Implementation of the Proposed Project is expected to result in exceeding the County Congestion Management Program (CMP) standard level of service (LOS E), to LOS F, along with a significant increase in V/C due to the Project, at several locations.

Roadway Segment Analysis

Based on the established significant impact criteria, the Proposed Project will have a significant impact if it causes a roadway segment at LOS E or F to experience a change in V/C of 0.02 or greater. Based on the results of the modeling and impact analysis, several locations are forecast to be significantly impacted.

Roadway Segment Impacts Due to Proposed Highway Plan Amendments

Per the Highway Plan in the Proposed General Plan Update would also impact several roadway segments, including 110th Street West between Johnson Road and Avenue M (Antelope Valley Planning Area), Fullerton Road between La Habra Heights City Line and Harbor Boulevard (East San Gabriel Valley Planning Area), Fullerton Road between Harbor Boulevard and Colima Road (East San Gabriel Valley Planning Area), Whites Canyon Road between Vasquez Canyon Road and Plum Canyon Road (Santa Clarita Valley Planning Area), and Lincoln Boulevard between Washington Boulevard and the Los Angeles City Line (Westside Planning Area).

Mitigation Measures:

- T-1 The County shall continue to monitor potential impacts on roadway segments and intersections on a project-by-project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available.
- T-2 The County shall implement over time objectives and policies contained within the General Plan Mobility Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.
- T-3 The County shall participate with Metro, the CMP Agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, and apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a "fair-share" program that would apply to all development (of a certain size) within the unincorporated areas.
- T-4 The County of Los Angeles shall continue to secure the funding needed to implement the future planned improvements within the Project Area. A variety of funding sources shall be explored, such as Metro's CMP Fee Program as described under T-3, Metro Call for Project funds, and federal and state grant opportunities. If the CMP fee program is not adopted by Metro and the County of Los Angeles, other funding sources for regional transportation needs in the Project Area, including Caltrans facilities, shall be pursued such as a potential North County Development Impact Fee Program, development agreements for large projects, and/or mitigation agreements between future applicants and Caltrans for projects that impact Caltrans facilities.

T-5 The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing high occupancy vehicle (HOV) lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.

T-6 The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of statewide, regional, or areawide significance per CEQA Guidelines §15206(b). When preparing traffic impact studies, the most up to date Guide for the Preparation of Traffic Impact Studies from Caltrans shall be followed. Proposed developments meeting the criteria of statewide, regional or areawide include:

- Proposed residential developments of more than 500 dwelling units
- Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
- Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space
- Proposed hotel/motel developments of more than 500 rooms

When the CEQA criteria of regional significance are not met, Caltrans recommends that Project Applicants consult with Caltrans when a proposed development includes the following characteristics:

- All proposed developments that have the potential to cause a significant impact to state facilities (right-of-way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible.
- Any development that assigns 50 or more trips (passenger car equivalent trips) during peak hours to a state freeway.
- Any development that assigns 10 or more trips (passenger car equivalent trips) during peak hours to an off-ramp. On/off-ramps that are very close to each other in which the project trips may cause congestion on the left-turn lane storage to the on-ramp.
- Any development located adjacent to or within 100 feet of a state highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units or less).
- When the County cannot determine whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

When it cannot be determined whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

To the extent that the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County, there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control. Such changes or alterations are within the responsibility and jurisdiction of another public agency (i.e., cities and Caltrans) and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Therefore, Impact 5.16-1 would remain significant and unavoidable, and a Statement of Overriding Considerations is required.

9. Utilities and Service Systems

Impact 5.17-3: Water supply and delivery systems are not adequate to meet Proposed Project's requirements in the Antelope Valley and Santa Clarita Valley Planning Areas beyond 2035.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-45 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

The projected net increase in water demands due to Proposed Project buildout is approximately 158 million gallons per day.

Antelope Valley Planning Area

Total water demands at Proposed Project buildout in the unincorporated areas of the Antelope Valley Planning Area are estimated to be 152 million gallons per day (170,400 afy). Total water supplies in the Antelope Valley Integrated Regional Water Management (IRWM) Region in 2035 are forecast to be approximately 210,600 afy, which is adequate for the projected 2035 population of 547,000 people for the whole Antelope Valley IRWM Region including the incorporated cities of Palmdale and Lancaster, unincorporated areas, and part of Kern County. No estimate of supply beyond 2035 is available for the Antelope Valley IRWM Region. Therefore, even with planned future water supplies under consideration by Antelope Valley water agencies, water supplies in the Antelope Valley Planning Area would not be adequate to serve the buildout of the Proposed Project. New

and/or expanded water supplies would be required to meet such demands. This impact would be significant.

Santa Clarita Valley Planning Area

The impact conclusions in the Santa Clarita Valley Area Plan EIR are hereby incorporated by reference. As discussed in Section 3.13, *Water Service*, of the Santa Clarita Valley Area Plan certified EIR, impacts would be less than significant after implementation of mitigation within the service area of the Castaic Lake Water Agency and/or within the East Subbasin of the Santa Clara River Valley Groundwater Basin; and significant and unavoidable outside of those two areas. Since the Proposed Project does not change any of the land uses within the Santa Clarita Valley Planning Area, no additional impacts beyond those disclosed in the One Valley One Vision (OVOV) Certified EIR would occur as a result of the Proposed Project.

Remaining Nine Planning Areas

Total water supplies in the five IRWM regions in Los Angeles County mainly consisting of the remaining nine Planning Areas in 2035 are estimated to be 2.03 million afy, or about 1,808 mgd.¹¹ Total water demands in the remaining nine planning areas at Proposed Project buildout are estimated to be 1.83 million afy, or 1,632 mgd. Residual water supplies in these nine planning areas are thus approximately 200,000 afy or 176 mgd. The total net increase in water demands due to Proposed Project buildout in these nine planning areas is approximately 4.69 mgd or 5,258 afy. There is adequate forecasted residual water supply at buildout to serve the Proposed Project in the remaining nine planning areas, and impacts on water supplies would be less than significant.

Impacts on Water Treatment Capacity

The total water treatment capacity in the region is about 2.67 billion gallons per day. There is adequate water treatment capacity in the region for the net increase in water demands resulting from Proposed Project buildout, and impacts would be less than significant.

Mitigation Measures:

Antelope Valley and Santa Clarita Valley Planning Areas

Development Site Plans, Building Plans, and Landscaping Plans

- | | |
|-------|--|
| USS-1 | Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems. |
| USS-2 | Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate. |
| USS-3 | Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass. |
| USS-4 | Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units. |

¹¹ The five IRWM Regions are North Santa Monica Bay, Upper Los Angeles River, Upper San Gabriel and Rio Hondo, South Bay, and Lower San Gabriel and Los Angeles Rivers.

- USS-5 Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
- USS-6 Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
- USS-7 Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
- USS-8 Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
- USS-9 Promote energy efficiency and water conservation upgrades to existing non-residential buildings at the time of major remodel or additions.
- USS-10 Promote the use of permeable paving materials to allow infiltration of surface water into the water table.
- USS-11 Maintain stormwater runoff on site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
- USS-12 Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.
- USS-13 On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.
- USS-14 Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.
- USS-15 Where detention and retention basins or ponds are required, seek methods to integrate these areas into the landscaping design of the site as amenity areas, such as a network of small ephemeral swales treated with attractive planting.
- USS-16 Evaluate development proposals for consistency with the County Green Building Standards Code.
- USS-17 Promote Low Impact Development standards on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.

Water Supply Planning and Water Conservation

- USS-18 Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.
- USS-19 Monitor growth, and coordinate with water districts as needed to ensure that long-range needs for potable and reclaimed water will be met.
- USS-20 If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, take appropriate steps to limit, reduce, or otherwise modify growth permitted by the General Plan in consultation with water districts to ensure adequate long-term supply for existing businesses and residents.
- USS-21 Upon the availability of non-potable water, discourage and consider restrictions on the use of potable water for washing outdoor surfaces.
- USS-22 In cooperation with the Sanitation Districts and other affected agencies, expand opportunities for use of recycled water for the purposes of landscape maintenance, construction, water recharge, and other uses as appropriate.
- USS-23 In coordination with applicable water suppliers, adopt and implement a water conservation strategy for public and private development.

Finding 3:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County of Los Angeles hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

However, additional water supplies necessary to serve buildout of the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. Considering current water supply constraints—including the record 2013–2014 California drought—it is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

A. ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the DEIR.

Project Planning Alternatives

During the course of the Proposed Project, numerous variations in mapping were considered. The variations were a result of an iterative process of receiving input from stakeholders and County of Los Angeles staff, and refining the working maps that eventually became the Preferred Land Use Alternative. While some of these previous variations would have represented the opinions of a segment of stakeholders more strongly, or would have reduced environmental impacts further than the Proposed Project or other alternatives considered, they were not appropriate for analysis in the DEIR because they are no longer being pursued by the County of Los Angeles. They have since been refined or supplemented by the currently proposed General Plan Land Use Policy Map. Additionally, in 2010, an expert panel of biologists was convened to evaluate the County's Significant Ecological Areas (SEA) boundaries, and additional locations were identified as areas that warranted the SEA designation. The Proposed Project identifies 21 SEAs and 9 Coastal Resource Areas (CRAs) that represent the wide-ranging biodiversity of Los Angeles County and contain its most important biological resources. Therefore, the Proposed Project and the alternatives that are analyzed below were determined to provide the best scenarios to represent the different planning approaches that have been considered during the process.

Existing SEA Boundaries Alternative

Under this Alternative, the existing SEA boundaries would remain in effect. However, the Proposed SEA boundaries included as part of the Proposed Project are the result of a long process to update the SEA boundaries to reflect the most recent biological information available, as discussed below.

In 1999, the County began a comprehensive revision to the Existing General Plan. As part of this revision, an updated study of the SEAs was commissioned, which resulted in the 2000 Los Angeles County SEA Update Study. This updated study evaluated existing SEAs for changes in biotic conditions and considered additional areas for SEA status; proposed SEA boundaries based upon biotic evaluation; and proposed guidelines for managing and conserving biological resources within SEAs. After consideration of public and resource agency input, a draft SEA map was released for public review as part of the Comprehensive Update and Amendment to the Existing General Plan (Initial Study) in 2002.

In 2003, based on biological information and public input received, the County released a Draft General Plan policy and map document called *Shaping the Future 2025*, which included the draft SEA map that reflected changes to the proposed SEAs. The proposed SEAs were refined from 2003 through 2007, based on the SEA criteria, additional field work and literature review, and to address public comments. In 2008, the draft SEA map was released for public review as part of the draft General Plan. In 2010, an expert panel of biologists was convened to evaluate the SEA boundaries, and additional locations were identified as areas that warranted the SEA designation. Throughout the entirety of the SEA study and update process, modifications to the proposed boundaries have occurred based on biological information received through multiple public review periods. In 2011, the draft SEA map was released for public review as part of the Los Angeles County Draft 2035 General Plan.

The County is continuing to update and refine the SEA designations and policies, including changes to the policies, boundaries and technical descriptions of the SEAs. As stated above, the Proposed Project identifies 21 SEAs and 9 Coastal Resource Areas (CRAs) that represent the wide-ranging biodiversity of Los Angeles County and contain its most important biological resources. The 21 SEAs and 9 CRAs are recommended to replace the 61 SEAs designated in the Existing General Plan.

Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the 61 SEAs designated in the Existing General

Plan. As a result, this alternative was considered, but rejected since it would result in greater biological impacts as compared to the Proposed Project.

No Growth/No Development Alternative

The No Growth/No Development Alternative would prohibit all new development, restricting urban growth to its current extent. No alterations to the unincorporated areas would occur (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition. Implementation of this alternative would not provide adequate housing supply required to meet the County's obligations to provide its fair share of housing. By limiting development within Los Angeles County, implementation of this alternative would increase development pressure in surrounding counties, including Ventura, Kern, San Bernardino, Riverside, and Orange counties. It should also be noted that this alternative would not achieve any of the objectives established for the Proposed Project. As a result, this alternative has been rejected from further consideration.

B. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project. The alternatives are analyzed in detail in the following section.

- No-Project/Existing General Plan Alternative
- Reduced Intensity Alternative
- Antelope Valley Reduced Intensity Alternative

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only significant and unavoidable impacts are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Impacts involving agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation and traffic, and utilities and service systems were found to be significant and unavoidable.

Section 7.7 of the DEIR identifies the Antelope Valley Reduced Intensity Alternative as the environmentally superior alternative because of its ability to reduce the significant impacts of the Proposed Project while still meeting the basic objectives of the project. This alternative would lessen impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. In addition, the Antelope Valley Reduced Intensity Alternative meets all of the basic objectives established for the Proposed Project.

No Project/Existing General Plan Alternative

This alternative, which is required by CEQA, assumes that the Existing General Plan and implementing zoning would remain unchanged. The Existing General Plan originally adopted on November 25, 1980 would remain in effect, and no update to the Existing General Plan goals and

policies would occur. This alternative would also maintain the existing SEA boundaries. Other key components of the Proposed Project, including the establishment of Transit Oriented Districts (TODs) in the General Plan, amendment to the Mixed Use Zone (MXD), and adoption of the Community Climate Action Plan also would not occur under this alternative.

Under the No Project/Existing General Plan Alternative, a total of 602,024 dwelling units (additional 301,546 units from existing), a total population of 2,199,477 (additional 1,133,063 persons from existing), and total of 444,393 employees (additional 191,734 employees from existing) would occur at buildout.

Finding: Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the FEIR.

The No Project/Existing General Plan Alternative would have similar environmental impacts to the Proposed Project for aesthetics, agriculture and forestry resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, mineral resources, and population and housing. Impacts would be slightly reduced for air quality, hazards and hazardous materials, noise, public services, recreation, transportation and traffic, and utilities and service systems. However, impacts to biological resources and land use and planning would be greater under this alternative. In addition, while it would slightly reduce significant impacts with regard to agriculture and forestry resources, impacts to air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, utilities and service systems (water supply) would remain significant and unavoidable.

Implementation of the No Project/Existing General Plan Alternative would allow future growth that may not be compatible with the current goals and objectives of the County. This alternative would not update the existing SEA boundaries. Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the 61 SEAs designated in the Existing General Plan. In addition, such growth would not provide the mix of uses and housing that would be allowed under the Proposed Project. Other key components of the Proposed Project, including the establishment of TODs in the General Plan, amendment to the Mixed Use Zone (MXD), and adoption of the Community Climate Action Plan would not occur under this alternative. Specifically, the No Project/Existing General Plan Alternative does not promote mixed-use development, does not locate mixed uses near regional employment and activity centers, does not promote multi-modal transportation, and therefore would be inconsistent with SCAG's RTP/SCS for the unincorporated areas.

Reduced Intensity Alternative

This alternative would reduce the overall additional development intensity by 30 percent within each Planning Area as compared to the Proposed Project. Under the Reduced Intensity Alternative, a comprehensive update to the Existing General Plan goals and policies would occur, similar to the Proposed Project. Updates to the existing SEA boundaries based on the latest biological information and GIS mapping data would also occur. Other key components of the Proposed Project, such as the establishment of TODs in the General Plan, amendment to the Mixed Use Zone (MXD), and adoption of the Community Climate Action Plan would occur under this alternative.

Under the Reduced Intensity Alternative, a total of 558,380 dwelling units (additional 257,902 units from existing), a total population of 1,988,285 (additional 921,871 persons from existing), and a total of 410,300 employees (additional 157,641 employees from existing) would occur at buildout.

Finding: Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the FEIR.

The Reduced Intensity Alternative would have similar impacts for agriculture and forestry resources, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, mineral resources, and population and housing. Impacts would be reduced for aesthetics, air quality, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. In addition, while it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, utilities and service systems (water supply), these would remain significant and unavoidable.

This alternative would meet all of the project objectives identified in Section I, Part B (above), although not to the same extent. For instance, this alternative would involve the establishment of TODs in the General Plan and amendment to the Mixed Use Zone (MXD), although allowable densities would be reduced as compared to the Proposed Project.

Antelope Valley Reduced Intensity Alternative

This alternative would reduce the allowable development intensity within the Antelope Valley Planning Area. No other changes in any other Planning Area would occur. Under the Proposed Project, a total of 278,158 dwelling units, 1,070,571 residents, and 51,219 employees would be allowed in the Antelope Valley Planning Area at buildout. The alternative would reduce allowable dwelling units, population, and employment growth within the Antelope Valley Planning Area to 81,441 dwelling units, 311,920 residents, and 102,513 employees.

Under the Antelope Valley Reduced Intensity Alternative, a comprehensive update to the Existing General Plan goals and policies would occur, similar to the Proposed Project. Updates to the existing SEA boundaries based on the latest biological information and GIS mapping data would also occur. Other key components of the Proposed Project, such as the establishment of TODs in the General Plan, amendment to the Mixed Use Zone (MXD), and adoption of the Community Climate Action Plan would occur under this alternative.

Under the Antelope Valley Reduced Intensity Alternative, a total of 490,083 dwelling units (additional 189,605 units from existing), a total population of 1,655,675 (additional 589,261 persons from existing), and a total of 536,409 employees (additional 283,750 employees from existing) would occur in the Project Area at buildout.

Finding: The Antelope Valley Reduced Intensity Alternative would have similar impacts for geology and soils. Impacts would be reduced for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. In addition, while it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, utilities and service systems (water supply), these would remain significant and unavoidable.

As discussed in the DEIR, this alternative would meet all of the project objectives identified in Section I, Part B (above). On November 12, 2014, the County Board of Supervisors adopted an update to the Antelope Valley Area Plan, which is consistent with the buildout projections identified in the Antelope Valley Reduced Intensity Alternative analyzed in the DEIR. As a result, the County

finds that the Antelope Valley Reduced Intensity Alternative is environmentally superior to the Proposed Project analyzed in the DEIR and will make the necessary updates to the Los Angeles County General Plan Update to be consistent with the recently adopted Antelope Valley Area Plan.

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**STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES COUNTY GENERAL PLAN UPDATE EIR**

STATE CLEARINGHOUSE NO. 2011081042

I. INTRODUCTION

The County is the Lead Agency under CEQA for preparation, review, and certification of the Final EIR for the Los Angeles County General Plan Update. As the Lead Agency, the County is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether to approve the proposed Project. In making this determination the County is guided by State CEQA Guidelines Section 15093 which provides as follows:

“CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal (sic) project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered ‘acceptable.’

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.”

In addition, Public Resources Code Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and the State CEQA Guidelines Section 15093, the County has balanced the benefits of the proposed project against the following unavoidable adverse impacts associated with the proposed Project and has adopted all feasible mitigation measures with respect to these impacts. The County also has examined alternatives to the Proposed Project, none of which both meet the Project objectives and is environmentally preferable to the Proposed Project for the reasons discussed in the Findings and Facts in Support of Findings (Section IV of the CEQA Findings of Fact).

The Los Angeles County Board of Supervisors (the “Board”), the Lead Agency for this Project, having reviewed the Final EIR for the Los Angeles County General Plan Update, and reviewed all written materials within the County’s public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the Project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the Project.

II. SIGNIFICANT UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

Although some potential project impacts have been substantially avoided or mitigated, as described in the Findings and Facts in Support of Findings, there remain some project impacts for which complete mitigation is not feasible. For some impacts, mitigation measures were identified and adopted by the Lead Agency, however, even with implementation of the measures, the County finds that the impact cannot be reduced to a level of less than significant. The impacts and alternatives are described below and were also addressed in the Findings.

The EIR identified the following unavoidable adverse impacts of the proposed project:

A. Agriculture and Forestry Resources

- Impact 5.2 1: Buildout of the Proposed Project would convert mapped important farmland in the Antelope Valley Planning Area to non-agricultural uses. No mitigation measures are available that would reduce the impacts of the conversion of mapped important farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped important farmland due to the implementation of a project. This impact would remain significant and unavoidable.
- Impact 5.2 5: Buildout of the Proposed Project would indirectly result in the conversion of mapped important farmland to non-agricultural uses in the Antelope Valley and Santa Clarita Valley Planning Areas. Although goals and policies have been incorporated into the Proposed Project to protect farming operations from urbanization, these goals and policies cannot ensure that additional conversion of farmland will not occur. This impact would remain significant and unavoidable.

B. Air Quality

- Impact 5.3 1: Buildout of the Proposed Project would generate more population and employment growth and more VMT than the current general plan; therefore, the project would be inconsistent with SCAQMD’s 2012 AQMP and AVAQMD’s Ozone Attainment Plan. Mitigation measures incorporated into future development projects and adherence to the Proposed Project policies for operation and construction phases described in Impacts 5.3 2 and 5.3 3 above would reduce criteria air pollutant emissions associated with buildout of the Proposed Project. Goals and policies included in the Proposed Project would facilitate continued County of Los Angeles participation/cooperation with SCAQMD, AVAQMD, and SCAG to achieve regional air quality improvement goals, promote energy conservation design and development techniques, encourage alternative transportation modes, and implement transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plans due to the magnitude of growth and associated emissions that would be generated by the buildout of unincorporated Los Angeles County in accordance with the Proposed Project. Impact 5.3 1 would remain Significant and Unavoidable.

- Impact 5.3 2: Construction activities associated with the buildout of the General Plan Update would generate criteria air pollutant emissions that would exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by future construction activities associated with the buildout of the General Plan Update, no mitigation measures are available that would reduce impacts below SCAQMD's and AVAQMD's thresholds. Impact 5.3 2 would remain Significant and Unavoidable.
- Impact 5.3 3: Buildout of the proposed land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of the Proposed Project, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds. Impact 5.3 3 would remain Significant and Unavoidable.
- Impact 5.3 4: Buildout of the Proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants near existing or planned sensitive receptors. Goals and policies are included in the Proposed Project that would reduce concentrations of criteria air pollutant emissions and TACs generated by new development.

Review of projects by SCAQMD or AVAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure health risks are minimized. Mitigation Measure 3 2 would ensure mobile sources of TACs not covered under SCAQMD or AVAQMD permits are considered during subsequent project-level environmental review. Development of individual projects would be required to achieve the incremental risk thresholds established by SCAQMD or AVAQMD, and TACs would be less than significant.

However, localized emissions of criteria air pollutants could exceed the SCAQMD or AVAQMD regional significance thresholds because of the scale of development activity associated with theoretical buildout of the Proposed Project. For this broad-based General Plan project, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of the localized emissions thresholds. Therefore, in accordance with the SCAQMD and AVAQMD methodology, Impact 5.3 4 would remain Significant and Unavoidable.

C. Biological Resources

- Impact 5.4 1: Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Although direct impacts to special-status species would be mitigated, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Special-status species are dependent on a variety of habitat types (comprised of both common and sensitive habitats), and the conversion of common habitat types with the buildout of the Project would result in the overall reduction of habitat and resources to support special-status species. Thus, due to the loss of common habitats

capable of supporting special-status species and diminished resource availability, impacts to special-status species remain significant and unavoidable at the general plan level.

- Impact 5.4 4: The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Implementation of the Proposed Project will have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, buildout of the Project will impact regional wildlife linkages and may impact nursery sites. Thus, buildout of the Project will have a significant adverse effect on wildlife movement and nursery sites.

D. Cultural Resources

- Impact 5.5 1: Goals and policies have been incorporated into the Proposed Project to protect historic resources. However, the above policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the Proposed Project. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact.

E. Greenhouse Gas Emissions

- Impact 5.7 1: The CCAP would ensure that GHG emissions from buildout of the Proposed Project would be minimized. However, additional statewide measures would be necessary to reduce GHG emissions under the Proposed Project to meet the long-term GHG reduction goals under Executive Order S 03 05, which identified a goal to reduce GHG emissions to 80 percent of 1990 levels by 2050. CARB is currently updating the Scoping Plan to identify additional measures to achieve the long-term GHG reduction targets. At this time, there is no plan past 2020 that achieves the long-term GHG reduction goal established under S 03 05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology (CCST 2012). Since no additional statewide measures are currently available, Impact 5.7 1 would remain significant and unavoidable.
- Impact 5.7 2: Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. Impact 5.7 2 would remain significant and unavoidable.

F. Mineral Resources

- Impact 5.11 1: Buildout of the Proposed Project would cause a loss of availability of known mineral resources within the Antelope Valley Planning Area. No mitigation measures are available that would reduce this impact to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for the loss of availability of mineral resources due to the buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible. Such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. Impact 5.11 1 would be significant and unavoidable.
- Impact 5.11 2: Implementation of the Proposed Project would cause a substantial loss of the availability of mineral resources in one mineral extraction area identified in the existing Los Angeles County General Plan: the Little Rock Wash area in the Antelope Valley Planning Area. No mitigation measures are available that would reduce this impact to less than significant. Impact 5.11 2 impact would be significant and unavoidable.
- Cumulative Impacts: Cumulative projects in combination with the buildout of the Proposed Project would contribute to significant cumulative impacts in the Antelope Valley Planning Area. Urbanization and growth in the cities adjacent to the unincorporated areas would have the potential to result in land uses that are incompatible with mining and resource recovery and would result in a cumulative loss of available resources. Similar to portions of the unincorporated areas, the California Geological Survey has classified land within cities in Los Angeles County into MRZs. Adjacent cities have included protections in their general plans or other planning documents to protect these and other mineral resources. However, planned and projected growth in the region would result in a reasonably foreseeable loss of mineral resources due to the encroachment of incompatible uses that would limit future areas from being permitted for mining operations. No mitigation measures are available that would reduce this impact to less than significant; therefore, this impact would remain significant and unavoidable.

G. Noise

- Impact 5.12 1: Construction activities would result in temporary noise increases in the vicinity of the Proposed Project. Mitigation Measure 5.12 1 (construction-related noise) would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, Impact 5.12 1 (construction noise) would be significant and unavoidable.
- Impact 5.12 2: Buildout of the Proposed Project would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. No feasible mitigation measures are available to further reduce traffic noise impacts to existing noise sensitive receptors. Therefore, Impact 5.12 2 would remain significant and unavoidable.
- Impact 5.12 3: New noise-sensitive land uses associated with Proposed Project could be exposed to elevated noise levels from mobile sources along roadways. Implementation of the noise-related policies contained within the Proposed Project in addition to Mitigation Measure 5.12 2 would reduce exterior noise compatibility impacts. While interior noise levels are required to achieve the 45 dBA CNEL interior noise limit of Title 24 and Title 25, exterior noise levels may still exceed the County noise land use compatibility criteria, despite

exterior noise attenuation (i.e., walls and/or berms). Therefore, impacts related to exterior noise compatibility would remain significant and unavoidable.

- Impact 5.12 4: The Proposed Project could create elevated levels of groundborne vibration and groundborne noise, both in the short term and the long term. Mitigation Measure 5.12 3 (train-related vibration) would reduce potential train-related vibration impacts to new uses below the thresholds. Mitigation Measure 5.12 4 (construction-related vibration) would reduce vibration impacts associated with construction activities to the extent feasible. Mitigation Measure 5.12 5 (industrial-related vibration) would reduce potential vibration impacts from industrial uses to less-than-significant levels. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, Impact 5.12–4 (vibration) would remain significant and unavoidable.

H. Transportation and Traffic

- Impact 5.16 1: The impacted locations are still considered to be significantly impacted with mitigation. Because this is a program-level analysis, additional case-by-case mitigation analysis of impacts and mitigation will occur at the project-level to determine more specific physical, program and policy-level mitigation measures to reduce the level of impact below a significant level.
- Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right of way without Caltrans' approval). Therefore, Impact 5.16 1 would remain significant and unavoidable.
- Cumulative Impacts: Traffic analysis for the Proposed Project anticipates that the cumulative impact of the project traffic along with other regional growth at the identified ramp and freeway locations will be largely mitigated through a combination of regional programs that are the responsibility of other agencies such as cities and Caltrans. Future developers/project applicants will contribute its fair share to these regional programs, as applicable. However, if these programs are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the Proposed Project could result in a cumulatively significant traffic impact that may remain significant and unavoidable.

I. Utilities and Service Systems

- Impact 5.17 3: Adequate water supplies have been identified in the UWMP's for the Project Area for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. Considering current water supply constraints—including the record 2013–2014 California drought—it is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. Therefore, impacts of the Proposed Project buildout on water supplies are significant and unavoidable.

III. CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the Final EIR has indicated that there will be significant project impacts that are infeasible to mitigate.

A. Implements the Objectives Established for the Project

The County established the following objectives for the Los Angeles County General Plan Update project to aid decision-makers in their review of the project and associated environmental impacts:

- Provide a comprehensive update to the General Plan that establishes the goals and policies to create a built environment that fosters the enjoyment, financial stability, and well-being of the unincorporated areas and Los Angeles County.
- Improve the job-housing balance and fiscal sustainability by planning for a diversified employment base, providing a variety of commercial, industrial, and mixed-use land uses.
- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
- Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change.
- Support a reasonable share of projected regional population growth.
- Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the character and ecological importance of the unincorporated areas.
- Provide policy guidance to protect and conserve natural resources and to improve the quality of air, water, and biological resources.
- Coordinate equitable sharing of public and private costs associated with providing appropriate community services and infrastructure, and in a context-sensitive manner that addresses community character.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
- Recognize community and stakeholder interests while striving for consensus.
- Protect and enhance recreational opportunities and public access to open space and natural resources.

Implementation of the Proposed Project would achieve these objectives.

B. Represents a Guiding Framework for Future Development

Even without the implementation of the Proposed General Plan Update, SCAG projects population growth in the region to dramatically increase between existing conditions and 2035. This population increase will require development to accommodate housing, employment, and public service needs. Continued development in Los Angeles County is inevitable. The Proposed General Plan Update would shape development and protect resources while creating compatibility between the existing and proposed land uses. Without a comprehensive guiding framework of planning principles to outline development within the Project Area and concentrate development within the focus areas, development would occur under the Existing General Plan without consistent goals. The Proposed Project would help maintain balanced land uses, the phasing of development to ensure appropriate timing and placement of utilities and services, and create a stronger sense of community than would occur without this type of planning document.

However, the Proposed General Plan Update is more than just a policy and land use plan; it has components that are meant to guide government and community interaction and maintain the future sustainability of the economic, physical, and social development goals. The Proposed General Plan Update is a living document designed to adjust continuously to new opportunities and challenges. Through the continual upkeep of the General Plan, the County's approach to development throughout the project area would be comprehensive and unified.

C. Improves Quality of Life and the Physical Environment

Although development in the Project Area would have significant impacts on the environment (such as those on agriculture, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation, and utilities), a number of the policies would reduce these impacts on the environment and promote more environmentally sustainable development than would otherwise result in the development of the region. These types of policies include those that:

- Manage the roadway network and encourage multimodal and complete streets system of transportation: Mobility (M) Policies 1.1 through 1.3; 2.1 through 2.11; 3.1 through 3.4; 4.1 through 4.16; 5.1 through 5.5; 6.1 through 6.6; and 7.1 through 7.5.
- Maintain and conserve natural resources and agricultural resources: Conservation and Natural Resources (COS) Policies 1.1 through 1.6; 2.1 through 2.4; 3.1 through 3.12; 4.1; 5.1 through 5.7; 6.1 through 6.5; 7.1 through 7.4; 8.1 through 8.3; 9.1 through 9.4; 10.1 through 10.6; 11.1 through 11.4; 12.1 through 12.3; 13.1 through 13.10; 14.1 through 14.6; and Land Use (LU) Policies 3.1 through 3.3.
- Encourage health and wellness: Air Quality (AQ) Policies 1.1 through 1.4; Land Use (LU) Policies 5.7 and 5.8, and 8.1 through 8.3; and Safety Element Policies 4.1 through 4.6.
- Improve air quality and reduce greenhouse gas emissions: Air Quality (AQ) Policies 1.1 through 1.4; 2.1 and 2.2; 3.1 through 3.6; and Conservation and Natural Resources (C/NR) Policy 9.1.
- Promote opportunities for economic development: Economic Development (ED) Policies 1.1 through 1.8; 2.1 through 2.9; 3.1 through 3.3; 4.1 through 4.7; 5.1 through 5.13; and 6.1 through 6.3

D. The Proposed Project, as revised, is Considered Environmentally Superior to Continuation of the Existing General Plan

Since release of the Draft EIR, the Los Angeles County Board of Supervisors adopted the Antelope Valley Area Plan. This plan, approved on November 12, 2014, substantially reduces allowable residential development capacity in the Antelope Valley Planning Area and directs future growth to three Economic Opportunity Areas (EOAs). The recently adopted Antelope Valley Area Plan is consistent with the buildout projections identified in the Antelope Valley Reduced Intensity Alternative analyzed in the DEIR. As a result, the County finds that the Antelope Valley Reduced Intensity Alternative is environmentally superior to the Proposed Project analyzed in the DEIR and will make the necessary updates to the Los Angeles County General Plan Update to be consistent with the recently adopted Antelope Valley Area Plan.

Continuation of the Existing General Plan would allow future growth that may not be compatible with the current goals and objectives of the County. This alternative would not update the existing SEA boundaries. Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the 61 SEAs designated in the Existing General Plan. In addition, such growth would not provide the mix of uses and housing that would be allowed under the Proposed Project. Other key components of the Proposed Project, including the establishment of TODs in the General Plan, amendment to the MXD Mixed Use Zone, and adoption of the Community Climate Action Plan would not occur under this alternative. Specifically, the No Project/Existing General Plan Alternative does not promote mixed-use development, does not locate mixed uses near regional employment and activity centers, does not promote multi-modal transportation, and therefore would be inconsistent with SCAG's RTP/SCS for the unincorporated areas.

E. Conclusion

For the abovementioned reasons, adoption and implementation of the Proposed Project would have environmental, economic, and social benefits that outweigh the unavoidable adverse environmental impacts of the physical development of the Project Area. Implementation of the Proposed Project would help attain regional goals for land use, transportation, and economic stability; require environmentally sustainable development; and provide a guiding framework for future development. Therefore, the County of Los Angeles has adopted this Statement of Overriding Considerations.

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